

Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
OTTERBOURG P.C.  
230 Park Avenue  
New York, NY 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11  
:   
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
:   
Debtors<sup>1</sup>. : (Jointly Administered)  
----- X

**APPLICATION OF OTTERBOURG P.C. AS CO-COUNSEL TO THE  
AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT  
CLAIMANTS FOR THIRD INTERIM ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FROM  
JUNE 1, 2020 THROUGH AND INCLUDING SEPTEMBER 30, 2020**

<i>General Information</i>	
Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Retention Date:	September 16, 2019
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]
<b><i>Summary of Fees and Expenses Sought for the Application Period</i></b>	
Time period covered by this application:	June 1, 2020 through and including September 30, 2020 (the " <u>Application Period</u> ")
Amount of Compensation Sought as Actual, Reasonable, and Necessary for the Application Period:	\$682,293.50
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary for the Application Period:	\$2,091.13
Total Compensation and Expense Reimbursement Requested for the Application Period:	\$684,384.63
Amount of Compensation Paid but Not Yet Allowed to Date:	\$115,353.20
Amount of Expenses Paid but Not Yet Allowed to Date:	\$767.02

<b><i>Summary of Previous Request(s) and Payment(s) for Compensation and Expense Reimbursement</i></b>							
<b>Application</b>	<b>Period Covered</b>	<b>Fees Requested</b>	<b>Fees Paid</b>	<b>Expenses Requested</b>	<b>Expenses Paid</b>	<b>Balance</b>	<b>Order</b>
First Interim Application Dkt. No. 955	9/16/2019 through 1/31/2020	\$646,606.50	\$634,943.70 <sup>2</sup>	\$2,956.87	\$2,956.87	\$0.00	Dkt. Nos. 1159 and 1306

<sup>2</sup> At the request of the fee examiner, Applicant agreed to a fee and expense accommodation in the amount of \$11,662.80 in connection with its first interim fee application.

Second Interim Application Dkt. No.	2/1/2020 through 5/31/2020	\$336,192.00	\$331,192.00 <sup>3</sup>	\$1,604.92	\$1,504.92	\$0.00	Dkt. No. 1649
<b>TOTAL:</b>		\$646,606.50	\$634,943.70	\$2,956.87	\$2,956.87	\$0.00	

<i>Monthly Fee Statements Subject to the Application Period</i>						
Statement		Amount Requested		Amount Paid		
Period	Dkt. and Date	Fees	Expenses	Fees (80%)	Expenses (100%)	Balance
6/1/2020 – 6/30/2020	Dkt. No. 1726 Filed: 9/25/2020	\$144,191.50	\$767.02	\$115,353.20	\$767.02	\$28,838.30
7/1/2020 – 7/31/2020	Dkt. No. 1952 Filed: 11/13/2020	\$223,736.00	\$183.70	\$0.00	\$0.00	\$223,919.70
8/1/2020 – 8/31/2020	Dkt. No. 1953 Filed: 11/13/2020	\$149,450.50	\$688.96	\$0.00	\$0.00	\$150,139.46
9/1/2020 – 9/3/2020	Dkt. No. 1954 Filed: 11/13/20	\$164,915.50	\$451.45	\$0.00	\$0.00	\$165,366.95
<b>TOTAL</b>		<b>\$682,293.50</b>	<b>\$2,091.13</b>	<b>\$115,353.20</b>	<b>\$767.02</b>	<b>\$568,264.41</b>

This is a(n):	<input type="checkbox"/> Monthly
	<input checked="" type="checkbox"/> Interim
	<input type="checkbox"/> Final Application

<sup>3</sup> At the request of the fee examiner, Applicant agreed to a fee and expense accommodation in the amount of \$5,100.00 (\$5,000 in fees and \$100 in expenses) in connection with its second interim fee application.

Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
OTTERBOURG P.C.  
230 Park Avenue  
New York, NY 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
-----	X

**APPLICATION OF OTTERBOURG P.C. AS CO-COUNSEL TO THE  
AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT  
CLAIMANTS FOR THIRD INTERIM ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FROM  
JUNE 1, 2020 THROUGH AND INCLUDING SEPTEMBER 30, 2020**

TO: THE HONORABLE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE:

Otterbourg P.C. (“**Otterbourg**” or “**Applicant**”), Co-Counsel to the Ad Hoc Committee  
of Governmental and Other Contingent Claimants (the “**AHC**”) in the above-captioned cases in  
support of its third application (the “**Application**”) for allowance of interim compensation for

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

professional services rendered and reimbursement of expenses incurred from June 1, 2020 through and including September 30, 2020 (the “**Application Period**”), respectfully represents:

### **JURISDICTION, VENUE AND STATUTORY PREDICATES**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are Sections 330 and 331 of Title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”). This Application has been prepared in accordance with *General Order M-447*, the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases pursuant to Local Rule 2016-1(a) (as updated June 17, 2013)* (the “**Local Guidelines**”), and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in larger Chapter 11 Cases, effective November 1, 2013* (the “**UST Guidelines**”) and, together with the Local Guidelines, the “**Guidelines**”). Attached hereto as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

### **BACKGROUND**

3. On September 16, 2019 (the “**Petition Date**”), Purdue Pharma L.P. and its affiliates (the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

4. The Debtors have remained in possession of their property and continue in the management of their business as a debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

5. An official committee of unsecured creditors (the “UCC”) was appointed by the Office of the United States Trustee (the “U.S. Trustee”) in this Case on September 27, 2019 [Dkt. No. 131].

6. On November 21, 2019, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 (the “**Interim Compensation Order**”) [Dkt. No. 529]. The Interim Compensation Order provides, among other procedures, that professionals are required to file and serve monthly itemized billing statements and interim fee applications.

7. On December 2, 2019, the Court entered an *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* (the “**Fee Assumption Order**”). [Dkt. No. 553]. The Fee Assumption Order permits the payment of the fees and expenses of the AHC’s professionals, including Applicant, *nunc pro tunc* to September 16, 2019, and requires compliance with the procedures set forth in the Interim Compensation Order. A copy of the Fee Assumption Order is annexed hereto as **Exhibit B**.

**SUMMARY OF PROFESSIONAL COMPENSATION  
AND REIMBURSEMENT OF EXPENSES REQUESTED**

8. By this Application, Applicant seeks an order approving on an interim basis: (a) compensation in the amount of \$682,293.50 and (b) expenses in the amount of \$2,091.13, representing actual and necessary expenses Applicant incurred in connection with its rendition of professional services to the AHC during the Application Period.

9. In accordance with the Interim Compensation Order, Applicant filed the following interim fee applications:

- On March 16, 2020, Applicant filed a request for first interim allowance of fees and expenses in this Case, covering the period from September 16, 2019 through and including January 31, 2020 [Dkt. No. 955]. The Court entered an order on May 15, 2020 approving that first interim request [Dkt. No. 1159]. On June 26, 2020 the Court entered a supplemental order permitting payment of the holdback amounts, less certain reductions of fees and expenses agreed to between Applicant and the fee examiner appointed in these cases [Dkt. No. 1306].
- On July 20, 2020, Applicant filed a request for second interim allowance of fees and expenses in this Case, covering the period from February 1, 2020 through and including May 31, 2020 [Dkt. No. 1456]. The Court entered an order on September 2, 2020 approving that second interim request [Dkt. No. 1649].

10. The following Monthly Fee Statements were filed by Applicant during the Application Period:

<i>Monthly Fee Statements Subject to the Application Period</i>						
Statement		Amount Requested		Amount Paid		
Period	Dkt. and Date	Fees	Expenses	Fees (80%)	Expenses (100%)	Balance
6/1/2020 – 6/30/2020	Dkt. No. 1726 Filed: 9/25/2020	\$144,191.50	\$767.02	\$115,353.20	\$767.02	\$28,838.30
7/1/2020 – 7/31/2020	Dkt. No. 1952 Filed: 11/13/2020	\$223,736.00	\$183.70	\$0.00	\$0.00	\$223,919.70

8/1/2020 – 8/31/2020	Dkt. No. 1953 Filed: 11/13/2020	\$149,450.50	\$688.96	\$0.00	\$0.00	\$150,139.46
9/1/2020 – 9/3/2020	Dkt. No. 1954 Filed: 11/13/20	\$164,915.50	\$451.45	\$0.00	\$0.00	\$165,366.95
<b>TOTAL</b>		<b>\$682,293.50</b>	<b>\$2,091.13</b>	<b>\$115,353.20</b>	<b>\$767.02</b>	<b>\$568,264.41</b>

11. Applicant attaches the following in support of this Application:

- Exhibit C is a summary of the compensation sought by Applicant by project code for the Application Period and a comparison to the Applicant's budget and proposed staffing plan.
- Exhibit D is a list of the attorneys and paraprofessionals who have worked on this case during the Application Period, the aggregate time invested by each individual, the applicable hourly billing rate, and the amount of fees attributable to each individual, as well as the hours and time spent by position (*e.g.*, partner, associate, clerk), blended hourly rates, and a comparison against the blended rates of other non-insolvency attorneys and professionals at Otterbourg.
- Exhibit E contains a copy of the computer-generated time entries reflecting the time recorded during the Application Period, organized in project billing categories by the Applicant.
- Exhibit F is a summary of reimbursement sought by the Applicant by expense type for all expenses incurred during the Application Period.
- Exhibit G contains a copy of the computer-generated list of expenses incurred during the Application Period.

#### **SUMMARY AND HIGHLIGHTS OF SERVICES RENDERED**

12. During the Application Period, Applicant performed services on a variety tasks for the AHC, all of which are set forth in Applicant's detailed time records. The following summary is intended only to highlight some of the services rendered by Applicant during the Application Period and is not intended to be a complete recitation of all activities or of all activities performed. Although every effort was made to consistently categorize the actual services provided into the appropriate category, certain tasks were interrelated and could properly be categorized in multiple categories.



**A. Claims Analysis**

13. Applicant spent a significant amount of time during the Application Period in connection with the preparation of a consolidated proof of claim for forty-nine states, the District of Columbia and six territories (the “**Claimants**”). The filing of a consolidated proof of claim was permitted pursuant to the Orders establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “**Bar Date Order**”)<sup>2</sup> [Dkt. Nos. 800, 1221]. In accordance with the Bar Date Order, on July 30, 2020, a consolidated claim was filed on behalf of the Claimants, which asserted damages in excess of \$2 trillion (the “**Consolidated Claim**”). The filing of the Consolidated Claim was not only required, but was a critical step in these bankruptcy cases towards formulating a plan of reorganization, particularly if a settlement could not be reached among the Debtors’ creditors.

14. In connection with the preparation of the Consolidated Claim, during the Application Period, Applicant worked extensively with the Claimants, working collaboratively with not only the Claimants represented by the AHC, but also with Claimants represented by the Non-Consenting State Group (“**NCSG**”). Applicant actively participated in weekly meetings of all the Claimants, together with counsel representing the NCSG, and The Brattle Group (“**Brattle**”) which was specially retained by the Claimants to assist with this task. In preparation for drafting the Consolidated Claim, Applicant met daily by calls or videoconference with NCSG counsel and certain State Claimant representatives, together with Brattle, to gather (i) research with respect to the underlying legal theories of the Consolidated Claim, (ii) factual information

---

<sup>2</sup> On June 3, 2020, the Court entered an order extending the general bar date from June 30, 2020 to July 30, 2020. Applicant reviewed the pleadings in connection with the request to extend the bar date and participated in the hearing on June 3, 2020.

previously compiled by various state agencies and national sources, and (iii) uniform analytic statistics relating to the Consolidated Claim. Applicant also addressed inquiries from individual states from time to time regarding the issues regarding the Consolidated Claim and claim submission process.

15. The preparation of the Consolidated Claim was a multi-month process, which was not surprising given the number of Claimants involved and the magnitude of the damages that were asserted. The Consolidated Claim included collective theories of damages that were common to all of the Claimants, as well as additional theories of damages that were unique to each State or territory based on their particular laws. Applicant assisted in the preparation of a presentation made to the Claimants and their front offices outlining what is required for the proof of claim, the asserted legal theories and damages to be asserted. Applicant also assisted in preparing numerous emails to the Claimants advising of significant deadlines and revisions to the draft Consolidated Claim.

16. Applicant also dedicated significant time to the actual drafting and oversight of the preparation of the Consolidated Claim, including reviewing and revising portions of the Consolidated Claim. In addition, Applicant researched certain issues relevant to the collective theories of damages that were asserted. During the course of the Application Period, the Consolidated Claim underwent multiple revisions based upon feedback from the Claimants and Brattle, together with other damages experts retained by the Claimants. The Consolidated Claim that was filed with the Court was 287 pages, including exhibits for each of the fifty-six Claimants. Applicant, together with counsel for the NCSG and certain of the leading State representatives, coordinated with the other Claimants to obtain the information necessary to complete the individualized exhibits for each of the Claimants.

17. Applicant coordinated with the Debtors' claim agent (Prime Clerk) on the process for the filing of the Consolidated Claim, which was unique in this case because it was a claim filed by multiple Claimants. Similarly, Applicant communicated with counsel for the Debtors and the UCC regarding the filing of the Consolidated Claim and the authorizations received by each of the Claimants.

18. Following the filing of the Consolidated Claim, Applicant and counsel for the NCSG coordinated on making multiple preliminary presentations to the Debtors with respect to the Consolidated Claim. To facilitate a free exchange of information with the Debtors, Applicant drafted an information sharing protocol, which underwent multiple iterations after receiving comments from various interested parties.

19. Applicant prepared for and assisted with the presentation of the Consolidated Claim to the Debtors. Following the preliminary presentation, a follow-up presentation was scheduled to further address certain specific legal questions raised by the Debtors. In connection with making these presentations, Applicant coordinated with co-counsel to the AHC and with the various Claimants to gather their individualized responses to the inquiries regarding issues unique to the governing law in their specific state or territory. Applicant assisted in preparing the response and in researching specific questions relevant to the collective theories of recovery. Applicant also prepared for and helped in the presentation made to the Debtors to address their additional questions. Similarly, a group of private injury claimants raised certain questions regarding the Consolidated Claim, which Applicant reviewed and analyzed to assist in the response to such inquiries.

20. Applicant also worked closely with co-counsel for the non-state governmental entities in connection with the preparation of a consolidated claim on their behalf, seeking

authorization from Debtors and the UCC concerning the filing of the Consolidated Claims. In addition, Applicant coordinated research and presentation of various legal arguments in support of the state and non-state governmental claims.

21. During the Application Period, Applicant also reviewed and analyzed the filed claims made by particular groups of creditors and reviewed the class certification motions filed by other groups that sought class certification so that they could file a consolidated claim on behalf of the interests they purportedly represented. Applicant discussed with other AHC counsel the class certification motions and the potential impact on the case. Applicant, together with co-counsel, reviewed the motions with the AHC, provided counsel on how best to respond to the motions and reviewed the statement prepared by the AHC with respect to certain of the class certification motions.

**B. Asset Analysis and Recovery**

22. In connection with fulfilling its duties, the AHC and its professionals have undertaken certain due diligence to examine the Debtors' business operations and the assets of the Sackler family and their holdings. Such due diligence is necessary in connection with formulating a plan of reorganization and verifying information relevant to the settlement framework reached between the AHC, the Sacklers and the Debtors prior to the Petition Date. Critical to the AHC's work is understanding the worth of the assets that may be available for distribution under a plan, assuming a variety of scenarios, and overall distributable value.

23. During the Application Period, Applicant participated in conference calls and virtual meetings with the AHC's financial advisors to review reports regarding the Debtors' business operations and projections. In advance of such meetings, Applicant reviewed the presentations from the AHC's financial advisors, and participated in conference calls, regarding the due diligence being undertaken with respect to the businesses of the Sackler family. These

due diligence updates are critical to understanding how to best optimize value in a plan of reorganization for creditors. Applicant also participated in a conference call between the Sacklers and the AHC.

24. In addition, during the Application Period, Applicant reviewed further revisions made to the protective order entered into with the Debtors and others regarding the sharing of information so that the necessary parties could have access to pertinent due diligence and financial information. Applicant also monitored ongoing discovery disputes, primarily between the UCC and the Sacklers, to be able to advise the AHC and help formulate a position with the Court regarding such disputes and to ensure that all necessary information continues to be provided to the AHC's professionals.

**C. Plan and Disclosure Statement**

25. During the Application Period, Applicant began to analyze and consider, along with co-counsel, the potential framework of a plan of reorganization. By the end of the Application Period, issues of allocation were largely resolved through mediation<sup>3</sup> and other issues regarding a plan of reorganization have come to the forefront. Even prior to the end of mediation on allocation issues, Applicant had several discussions with co-counsel, as well as counsel to the NCSG, regarding open issues that must be resolved to achieve a consensual plan of reorganization, including contributions to be made by the Sackler family and the post-emergence governance structure of Purdue and any additional structuring vehicles required to be created pursuant to a plan of reorganization.

26. The Debtors, with the AHC's support, sought and obtained approval from the Court to expand the role of the mediators to seek to resolve, among other things, issues regarding

the contribution to be made by the Sackler family. Applicant participated in the September 17, 2020 hearing with the Court to consider the request. Applicant also reviewed the evolving analyses done by the AHC's financial advisors on sources of funds and uses for any plan of reorganization.

**D. Business Operations**

27. During the Application Period, Applicant reviewed open issues relating to the Debtor's motion for a Key Employee Incentive and Retention Plan (the "**KEIP/KERP Motion**") that had not previously been resolved. These issues related primarily to bonuses and incentives intended for the more senior employees of the Debtors for which there were outstanding objections. Applicant monitored the ongoing negotiations and reviewed the updates regarding the negotiations between the Debtors and the UCC and participated in discussions with the AHC regarding the proposed settlement terms.

28. Also during the Application Period, a second hearing was held regarding the Debtors' motion to enter into a funding agreement with Harm Reduction Therapeutics, Inc. to develop an over-the-counter naloxone nasal spray device (the "**HRT Motion**") [Dkt. No. 1005]. The AHC and its professionals had several remaining questions with respect to the HRT Motion. The HRT Motion was later amended following feedback from several constituents. Applicant, together with co-counsel, discussed the HRT Motion with the AHC and advised it regarding a possible response to the HRT Motion. Applicant participated in the June 23, 2020 hearing to consider the HRT Motion, during which the Court approved it.

---

<sup>3</sup> In accordance with the approval of the Fee Assumption Order, time spent with respect to allocation, which includes the mediation to determine how assets should be allocated among the different creditor groups, is billed separately and is subject to a separate application for payment.

**E. Case Administration/General Services**

29. During the Application Period, Applicant participated in many conference calls and video calls with its co-counsel, individual members of the AHC, and other parties to the case, including, among others, the Department of Justice, counsel to the NCSG, counsel to the multi-state group and the monitor appointed in these cases to receive an overview of his report. Applicant also reviewed the pending motions before the Court and participated in court hearings.

30. Applicant also reviewed the request of the NAACP to intervene, discussed the request with the AHC and co-counsel to the AHC, and participated in a conference call with the NAACP in an effort to consensually address the concerns raised by the NAACP to everybody's satisfaction.

31. Throughout all of these activities, Applicant organized with co-counsel by regularly communicating among the firms and determining the specific tasks to be undertaken by each. It was also particularly important given the size of the AHC that subsets of groups could organize and have a point of contact to discuss issues specific to each constituency and communicate them to other co-counsel and the remainder of the AHC group. Applicant primarily coordinated with the states on intra-committee issues to ascertain their positions and seek solutions. While there were activities that necessarily required full participation of the professionals, tasks were coordinated to avoid duplication of efforts.

32. Applicant also prepared and filed monthly fee statements and its second interim fee application as required by the Compensation Procedures Order.

**F. Meetings and Communications with Ad Hoc Committee**

33. Throughout the Application Period, Applicant and its co-counsel kept the AHC members advised of all matters in the case, providing regular updates and responding to inquiries. The AHC has weekly update calls with the entire AHC and also has regular calls with

the subcommittees, some of which occur on a weekly basis and others on an as-needed basis. Certain more pressing issues required multiple conference calls in a single day. Applicant also had regular calls with the states (both those that are members of the AHC and those that are supporting states, but not on the AHC) to keep them up to date on matters in the case and to address issues that are unique to the states and, when necessary, presenting those positions to the other non-state members of the AHC.

### **EVALUATING APPLICANT'S SERVICES**

34. Applicant submits that its request for the second interim allowance of compensation is reasonable and appropriate. The services rendered by Applicant, as highlighted above, required substantial time and effort.

35. Bankruptcy Code section 331 provides for interim compensation of professionals and incorporates the substantive standards of Bankruptcy Code section 330 to govern the Court's award of such compensation. Bankruptcy Code section 330 provides that a court may award a professional employed under Bankruptcy Code section 327 "reasonable compensation for actual, necessary services rendered ... and reimbursement for actual, necessary expenses." Bankruptcy Code section 330 also sets forth the criteria for the award of such compensation and reimbursement.

36. In determining the amount of reasonable compensation to be awarded, the Court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including:

- a. the time spent on such services;
- b. the rates charged for such services;



- c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- e. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

37. Applicant respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the AHC, the Debtors, the Debtors' estates, and other parties in interest. Applicant also submits that the services rendered to the AHC were performed economically, effectively and efficiently and were necessary. Applicant further submits that the compensation requested herein is reasonable in light of the nature, extent and value of such services and that the fees billed and expenses incurred were well within the parameters of the budget provided to the Debtors, which estimated monthly fees of \$250,000.

38. Applicant coordinated with co-counsel to the AHC to assign tasks and avoid duplication of services. Certain services, such as participation in court hearings, conference calls and meetings and review of pertinent documents, necessarily required the involvement of multiple co-counsel advising the AHC. Applicant was primarily responsible for interfacing with the state members of the AHC and bringing such issues and concerns to the remainder of the AHC and other co-counsel.

39. Applicant's hourly rates and fees charged are consistent with the market rate for comparable services. As set forth in the Cyganowski Certification, the hourly rates and fees charged by Applicant are the same as those generally charged to, and paid by, Applicant's other clients.

40. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "**Allocation Fees**"). Pursuant to the Fee Assumption Order, which may be approved through a separate application process.

41. In summary, the services rendered by Applicant were necessary and beneficial to the AHC and the Debtors' estates, and were consistently performed in a timely manner commensurate with the complexity, importance, novelty and nature of the issues involved. Accordingly, approval of the compensation sought herein is warranted.

### **DISBURSEMENTS**

42. Applicant incurred actual and necessary out-of-pocket expenses during the Application Period, which are set forth in Exhibit G. By this Application, Applicant respectfully requests allowance of such reimbursement in full. The disbursements for which Applicant seeks reimbursement include, among others:

- a. Computer Research Charges – Otterbourg's practice is to bill clients for electronic research at actual cost, which does not include amortization for maintenance and equipment.
- b. Conference Calls– Otterbourg's practice is bill clients for conference calls at actual cost to the firm.

### **APPLICANTS' STATEMENT PURSUANT TO APPENDIX B OF THE UST GUIDELINES**

43. The following statement is provided pursuant to § C.5. of the UST Guidelines.

- a. **Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms of services pertaining to this engagement that were provided during the application period? If so, please explain.

**Answer:** No.

- b. **Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are

higher by 10% or more, did you discuss the reasons for the variation with the client?

**Answer:** The fees sought in the Application do not exceed the fees budgeted for the Application Period and are, in fact, considerably less than the amount budgeted.

- c. **Question:** Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

**Answer:** No.

- d. **Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

**Answer:** Yes. There were .8 hours (\$680) recorded for reviewing fee time.

- e. **Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Answer:** No.

- f. **Question:** If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

**Answer:** There were no rate increases during the Application Period.

*[Remainder of Page Left Blank]*

**CONCLUSION**

**WHEREFORE**, the Applicant respectfully requests that this Court enter an order (a) allowing on an interim basis compensation in the aggregate amount of \$682,293.50 for fees for services rendered during the Application Period; (b) allowing on an interim basis actual, necessary expenses incurred in connection with such services in the aggregate amount of \$2,091.13; (c) authorizing and directing the Debtors to pay to the unpaid fees for services rendered during the Application Period expenses associated with such services; and (d) granting such other and further relief as may be just or proper.

New York, New York  
Dated: November 16, 2020

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
OTTERBOURG P.C.  
230 Park Avenue  
New York, NY 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

# **EXHIBIT A**

## **Certification**

Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
OTTERBOURG P.C.  
230 Park Avenue  
New York, NY 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
-----	X

**CERTIFICATION OF MELANIE L. CYGANOWSKI IN RESPECT OF APPLICATION  
OF OTTERBOURG P.C. AS CO-COUNSEL TO THE AD HOC COMMITTEE OF  
GOVERNMENTAL AND OTHER CONTINGENT CLAIMANTS FOR SECOND  
INTERIM ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FROM JUNE 1, 2020  
THROUGH AND INCLUDING SEPTEMBER 30, 2020**

I, Melanie L. Cyganowski, hereby certify that:

1. I am a member of the firm of Otterbourg P.C. ("Otterbourg"). By Order of the  
Court, dated December 2, 2019, the Debtor was authorized to pay fees and expenses of

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Otterbourg as Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Claimants *nunc pro tunc* to September 16, 2019 (the “Petition Date”). [553]

2. I am the professional designated by Otterbourg with the responsibility for compliance with the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* (as updated June 17, 2013) (the “Local Guidelines”), and the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases*, adopted by the Executive Office for the United States Trustee (the “UST Guidelines”, and together with the Local Guidelines, the “Guidelines”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, [Dkt. No. 529] (the “Interim Compensation Order”).

3. This Certification is made in support of Otterbourg’s third interim application (the “Interim Fee Application”) for the interim allowance of compensation for services rendered and reimbursement of expenses incurred for the period from June 1, 2020 through and including September 30, 2020 (the “Application Period”).

4. I have reviewed the Interim Fee Application.

5. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg accounting personnel and legal and paraprofessional staff, the Interim Fee Application complies with the mandatory guidelines set forth in the Guidelines.

6. The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by Otterbourg and generally accepted by Otterbourg’s clients.

7. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg personnel, Otterbourg does not make a profit in connection with any disbursements sought in the Interim Fee Application except (i) in recording certain

disbursements, for administrative convenience, charges are rounded up to the nearest dollar (*e.g.*, long distance telephone calls); (ii) volume discounts, if any, are not reflected (*e.g.*, Federal Express); and (iii) certain estimates for expenses related to various disbursements are not specifically calculated (*e.g.*, taxes, rental charges and related costs of Westlaw).

8. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg accounting personnel, Otterbourg does not include in the amount of any disbursements the amortization of the cost of any investment, equipment or capital outlay.

9. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg accounting personnel, to the extent that Otterbourg has purchased or contracted for services from a third party, reimbursement is sought only for the amount billed by the third party to Otterbourg and paid.

10. Otterbourg maintains supporting documentation for each item for which reimbursement is sought (*e.g.*, conference calls, meals chargeable and transportation) and such documentation is available for review on request by the Court or the United States Trustee.

11. Otterbourg has complied with the provisions requiring it to provide the United States Trustee for the Southern District of New York and the Debtor with a statement of the Applicant's fees and expenses.

12. The Notice Parties (as defined in the Interim Compensation Order) will each be provided with a copy of the Interim Fee Application.

New York, New York  
Dated: November 16, 2020

By: /s/ Melanie L. Cyganowski  
Melanie L. Cyganowski  
230 Park Avenue  
New York, New York 10169  
(212) 661-9100  
*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*



# **EXHIBIT B**

## **Fee Assumption Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**ORDER AUTHORIZING THE DEBTORS TO ASSUME THE REIMBURSEMENT  
AGREEMENT AND PAY THE FEES AND EXPENSES OF THE AD HOC  
COMMITTEE'S PROFESSIONALS**

Upon the motion (the “**Motion**”)<sup>2</sup> of Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in these cases (collectively, the “**Debtors**”), pursuant to sections 105(a), 363(b) and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), for an order (this “**Order**”) (a) authorizing the Debtors to assume the Reimbursement Agreement, attached to the Motion as **Exhibit B**, and (b) authorizing but not directing the Debtors to pay the reasonable and documented fees and expenses under the Reimbursement Agreement, without the need for further motion, fee application or order of the Court, as more fully set forth in the Motion; and the Court having jurisdiction to decide the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the requested relief being a

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the relief requested in the Motion having been provided, such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and upon the objections (or joinders to objections) to the relief requested in the Motion filed by the Ad Hoc Group of Individual Victims, the NAS Babies Ad Hoc Committee, the Official Committee of Unsecured Creditors, the Private Insurance Plaintiffs, the U.S. Trustee, and Certain Native American Tribes [Docket Nos. 454, 458, 459, 462, 463 and 468] and the responses thereto; and the Court having held a hearing to consider the relief requested in the Motion on November 19, 2019 (the “**Hearing**”); and upon the record of the Hearing and all of the proceedings had before the Court; and after due deliberation and for the reasons stated by the Court in its bench ruling at the Hearing the Court having determined that the legal and factual bases set forth in the Motion establish good and sufficient cause for the relief granted herein, which is in the best interests of the Debtors, their estates, their creditors and all parties in interest; now, therefore,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is granted to the extent set forth herein.
2. The Debtors are authorized to perform the Reimbursement Agreement pursuant to section 363 of the Bankruptcy Code, subject to and as modified by the terms of this Order.
3. Specifically, the Debtors are authorized, but not directed, to pay (i) Brown Rudnick LLP, (ii) Gilbert, LLP, (iii) Kramer Levin Naftalis & Frankel LLP, (iv) Otterbourg PC, (v) FTI Consulting, Inc., (vi) Compass Lexecon and (vii) Coulter & Justice (collectively, the “**Professionals**”) for their reasonable and documented fees and expenses in accordance with the terms and conditions of the Reimbursement Agreement and this Order; *provided* that, for the avoidance of doubt, the Debtors shall have no obligation to pay any fees, expenses or other

amounts incurred after the termination of the Reimbursement Agreement in accordance with its terms.

4. The authorization of the Debtors to pay (i) the reasonable and documented fees and expenses of the Professionals (other than those Professionals set forth in paragraph 3(vi) and (vii) above, which are addressed in subsection (z) of this paragraph 4 below) and (ii) reasonable and documented expenses (e.g., hotels, meals, travel costs, etc., but excluding the fees and expenses of any professional, including internal counsel, retained or employed by any Ad Hoc Committee member) incurred by the Ad Hoc Committee members in furtherance of their service on the Ad Hoc Committee (the “**Member Expenses**”) shall be subject, *mutatis mutandis*, to the procedures with respect to authorization of payment of the fees and expenses of the professionals of the Debtors and the UCC set forth in the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (as may be modified or amended by any subsequent order of the Court with respect thereto, the “**Interim Compensation Order**”) including, for the avoidance of doubt, the filing of Monthly Fee Statements and Applications (in each case as defined in the Interim Compensation Order), Interim Fee Hearings (as defined in the Interim Compensation Order), the expiration of the Objection Deadline (as defined in the Interim Compensation Order) or resolution of any Objections (as defined in the Interim Compensation Order) with respect each Monthly Fee Statement, and the 20% holdback with respect to fees until further order of the Court; *provided* that the standard for authorization of payment of the fees and expenses of the Professionals shall be whether such fees and expenses are (a) reasonable and documented and (b) reimbursable under the Reimbursement Agreement (including, without limitation, that such fees and expenses are not duplicative of other Professionals and are within the Scope (as defined in the Reimbursement Agreement)); *provided*

*further* that, for the avoidance of doubt, that the Professionals shall not be considered retained professionals of the Debtors or UCC and the retention of the Professionals shall not be required to satisfy the standards for retention set forth in sections 327-328 or 1103 of the Bankruptcy Code; *provided further* that, the Professionals shall seek reimbursement only for fees and expenses that are within the Scope (and, for the avoidance of doubt, neither filing objections to the claims of other creditors or advancing or prosecuting the claims of the individual members of the Ad Hoc Committee shall be considered within the Scope); *provided further* that, (x) the aggregate amount authorized to be paid pursuant to this Order shall not exceed \$1,500,000 with respect to the fees and expenses of the Professionals (including Compass Lexecon and Coulter & Justice) incurred prior to the Petition Date, (y) such prepetition fees and expenses of the Professionals, together with any prepetition Member Expenses, shall be sought only upon the earlier of (1) the execution of a restructuring support agreement among parties including the Debtors and each member of the Ad Hoc Committee and (2) confirmation of a chapter 11 plan for the Debtors, and (z) the Debtors shall not be authorized to pay any amounts to the Professionals set forth in paragraph 3(vi) and 3(vii) above (who are not currently actively engaged) unless and until authorized to do so by subsequent order of this Court in connection with one of the Applications referred to above; *provided further* that the fees and expenses of the Professionals incurred in connection with or relating to the allocation of value among the Debtors' creditors (the "**Allocation Fees**"), shall be segregated and recorded in separate matters or projects and shall be sought by Application only upon the earlier of (a) the approval by the Court of a restructuring support agreement among parties including the Debtors and each member of the Ad Hoc Committee (the "**RSA**") or (b) confirmation of a chapter 11 plan for the Debtors; *provided further* that to the extent an emergency relief fund for the use, prior to confirmation, of a substantial amount of the Debtors' cash to provide emergency relief and

assistance with respect to the opioid crisis (an “**ERF**”) has not previously been sought or approved by the Court, the RSA shall have within it a valid and credible proposal for an ERF; *provided further* that prior to the earlier of approval by the Court of an RSA or confirmation of a chapter 11 plan for the Debtors, each Professional that submits a Monthly Fee Statement or Application will include a representation therein that it has separately recorded its Allocation Fees and has not, to the best of its knowledge, included Allocation Fees in such Monthly Fee Statement or Application.

5. Notwithstanding anything to the contrary herein, the Debtors shall not be authorized to pay the fees and any expenses of any advisor to the Ad Hoc Committee other than the Professionals (as defined in paragraph 3), and the authorization to pay the fees and expenses of any advisor to the Ad Hoc Committee other than the Professionals (including any investment banker, as contemplated by the Reimbursement Agreement) shall be sought by a supplemental motion to this Court, *provided* that the Debtors are authorized to pay the fees of an investment banker, as contemplated by the Reimbursement Agreement, subject the same procedures applicable to the Professionals (as defined in paragraph 3), with the consent of the Debtors, U.S. Trustee and UCC to the retention of such investment banker and the terms of such retention.

6. Pursuant to and consistent with information and confidentiality protocols to be agreed between the Ad Hoc Committee, the Ad Hoc Group of Non-Consenting States<sup>3</sup> and the Governmental Entities Group<sup>4</sup>, and acceptable to the Debtors, and any protective order in these cases, the work product of certain financial professionals engaged by the Ad Hoc Committee, including FTI Consulting, Inc., shall be made available to the Ad Hoc Group of Non-Consenting States and the Governmental Entities Group with respect to matters on which such parties share a

---

<sup>3</sup> The Bankruptcy Rule 2019 statement for the Ad Hoc Group of Non-Consenting States is filed at Docket No. 296.

<sup>4</sup> The Bankruptcy Rule 2019 statement for the Governmental Entities Group is filed at Docket No. 409.

common interest, subject to the terms therein, and where such work product does not contain, reflect or reference confidential information of the Debtors that they have provided to the Ad Hoc Committee but not provided to the Ad Hoc Group of Non-Consenting States and the Governmental Entities Group. The delivery of information pursuant to such information protocols described in this paragraph shall not be deemed a waiver of any common interest privilege, attorney-client privilege, work product protection, or any other applicable privileges or protections with respect thereto.

7. The contents of the Motion and the notice procedures set forth therein constitute good and sufficient notice and satisfy the Bankruptcy Rules and the Local Rules, and no other or further notice of the Motion or the entry of this Order shall be required.

8. Nothing in this Order shall be deemed to constitute (i) a grant of third-party beneficiary status or bestowal of any additional rights on any third party or (ii) a waiver of any rights, claims or defenses of the Debtors.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

10. The relief granted herein shall be binding upon any chapter 11 trustee appointed in any of these chapter 11 cases or upon any chapter 7 trustee appointed in the event of a subsequent conversion of any of these chapter 11 cases to cases under chapter 7.

11. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: December 2, 2019  
White Plains, New York

/s/ Robert D. Drain  
THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

# **EXHIBIT C**

## **Summary of Compensation By Project Code**



**SUMMARY OF COMPENSATION BY  
PROJECT CODE FOR THE APPLICATION PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Billed Hours</b>	<b>Average Hourly Rate</b>	<b>Fees Recorded</b>
PU01	Asset Analysis and Recovery	31.1	\$1,171.33	\$36,428.50
PU03	Business Operations	9.2	\$1,208.86	\$11,121.50
PU04	Case Administration	111.3	\$1,245.58	\$138,632.50
PU05	Claims Analysis	402.3	\$964.66	\$388,084.00
PU06	Employment and Fee Applications	17.8	\$577.50	\$10,279.50
PU08	Litigation: Contested Matters, Adversary	4.0	\$841.75	\$3,367.00
PU09	Meetings and Communications with Ad Hoc	66.1	\$1,153.90	\$76,273.00
PU11	Plan and Disclosure Statement	17.0	\$1,065.15	\$18,107.50
	<b>TOTALS:</b>	<b>658.8</b>	<b>\$1,035.66</b>	<b>\$682,293.50</b>

**BUDGET V. ACTUAL FEES REQUESTED**

<b>Project Code</b>	<b>Project Category</b>	<b>Budgeted Hours</b>	<b>Actual Hours</b>	<b>Budgeted Fees</b>	<b>Actual Fees</b>
PU01	Asset Analysis and Recovery	70	31.1	\$75,000.00	\$36,428.50
PU02	Assumption and Rejection of Leases and Contract	0	0.0	\$0	\$0.00
PU03	Business Operations	45	9.2	\$50,000.00	\$11,121.50
PU04	Case Administration	136	111.3	\$150,000.00	\$138,632.50
PU05	Claims Analysis	365	402.3	\$400,000.00	\$388,084.00
PU06	Employment and Fee Applications	50	17.8	\$50,000.00	\$10,279.50
PU07	Emergency Financing	0	0.0	\$0	\$0.00
PU08	Litigation: Contested Matters, Adversary	23	4.0	\$25,000.00	\$3,367.00
PU09	Meetings and Communications with Ad Hoc	136	66.1	\$150,000.00	\$76,273.00
PU10	Non-Working Travel	0	0.0	\$0	\$0.00
PU11	Plan and Disclosure Statement	90	17.0	\$100,000.00	\$18,107.50
<b>TOTAL:</b>		<b>915.0</b>	<b>658.8</b>	<b>\$1,000,000.00</b>	<b>\$682,293.50</b>

**PROPOSED STAFFING PLAN APPLICATION PERIOD**

<b>Category of Timekeeper</b>	<b>Estimated Number of Timekeepers</b>	<b>Actual Number of Timekeepers</b>	<b>Average Hourly Rate Based on Actual Timekeepers</b>
Partner	2	1	\$1,315.00
Of Counsel	1	1	\$850.00
Associate	2	2	\$525.00
Paralegal	1	1	\$305.00

# **EXHIBIT D**

## **Summary of Hours By Professional**

**SUMMARY OF HOURS BILLED BY  
PROFESSIONALS FOR THE APPLICATION PERIOD**

**Attorney Hours for the Application Period**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hours</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315	386.9	\$508,773.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850	136.9	\$116,365.00
Robert C. Yan ("RCY") Associate	2002	\$625	8.5	\$5,312.50
Michael A. Pantzer ("MAP") Associate	2017	\$425	110.5	\$46,962.50
	<b>TOTAL</b>		<b>642.8</b>	<b>\$677,413.50</b>

**Paraprofessional Hours for the Application Period**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hours</b>	<b>Total Compensation</b>
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305	16.0	\$4,880.00
	<b>TOTAL</b>		<b>16.0</b>	<b>\$4,880.00</b>

**Total Fees for the Application Period By Position**

<b>Professional</b>	<b>Blended Rate</b>	<b>Total Hrs.</b>	<b>Total Fees Recorded</b>
Partner	\$1315.00	386.9	\$508,773.50
Of Counsel	\$850.00	136.9	\$116,365.00
Associate	\$439.29	119.0	\$52,275.00
Paralegal	\$305.00	16.0	\$4,880.00
<b>Blended Professional Rate</b>	<b>\$1,035.66</b>	<b>658.8</b>	<b>\$682,293.50</b>

**Blended Hourly Rate for Professionals Billing to Case v. Blended Hourly Rate of All Other Professionals for Last 12 Months**

<b>Professionals and Paraprofessionals</b>	<b>Blended Hourly Rate of Professionals and Paraprofessionals Not Billing to this Matter for Prior 12-Month Period by Position</b>	<b>Blended Hourly Rate of Professionals Billed for Application Period by Position</b>
Partner	\$960.91	\$1315.00
Of Counsel	\$802.08	\$850.00
Associate	\$454.12	\$439.29
Paraprofessional and Other Staff	\$305.00	\$305.00
Blended Attorney Rate/Total Attorney Fees	\$754.61	\$1,053.85
Blended Paralegal Rate	\$305.00	\$305.00

# **EXHIBIT E**

## **Time Entries**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

November 13, 2020  
BILL NO. 213603

For Services Rendered Through September 30, 2020:

Phase: PU01		ASSET ANALYSIS AND RECOVERY	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20 JKH	Review Documents Review agenda for hearing	.20	61.00
06/02/20 JSF	Examine Documents Examine Documents: Review of UCC Letter to Court re: Discovery Issues with IACs	.30	255.00
06/05/20 JSF	Examine Documents Review of Letters to Court From Sackler Parties, Norton Rose and NCSG in Response to UCC Letter to Court re: Discovery Deficiencies	.80	680.00
06/09/20 JSF	Examine Documents Review of Norton Rose Due Diligence Database - New Information Available	.30	255.00
06/09/20 MLC	Analysis of Memorandum Review of memorandum from KL concerning discovery due diligence including Houlihan analysis	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 2

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/20 MLC	Correspondence Review of email string between the (i) UCC's, AHC's and Debtors' financial advisors and (ii) Mundipharma's senior management team re IAC due diligence	.70	920.50
06/11/20 JSF	Telephone Call(s) Update from Houlihan and FTI re: Due Diligence on IACs and Domestic Business Plans	1.00	850.00
06/11/20 MLC	Conference call(s) Conference call with AHC subcommittee re diligence and related issues	1.10	1,446.50
06/11/20 MLC	Analysis of Memorandum Review of summary of discovery update re Sacklers and underlying letter responses	1.20	1,578.00
06/12/20 MLC	Correspondence Correspondence with NCSG re non-cash transfer IC report	.40	526.00
06/12/20 MLC	Correspondence Correspondence re company due diligence reports	.30	394.50
06/17/20 MLC	Review Financial Documents Review of April business plan update analysis and Project Malta sale process update prepared by FTI	1.80	2,367.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 3

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/22/20 MLC	Analysis of Memorandum Review and analysis of information deck prepared by FTI and Houlihan concerning Companies' assets	.80	1,052.00
06/23/20 JSF	Examine Documents Review of FTI Updated Cash Available Analysis	.40	340.00
06/24/20 JSF	Examine Documents Review of Company Presentation re: Updated Value Analysis of Assets and Sale Scenario Analysis	.60	510.00
06/26/20 JSF	Examine Documents Review of NCSG Motion for 2004 Discovery and Consideration of AHC Joinder to Motion	.30	255.00
06/26/20 MLC	Conference call(s) Discovery Rule 2004 motion conference with AHC counsel	.50	657.50
07/01/20 JSF	Examine Documents Review of UCC Motion Seeking 2004s of IACs and Related Sackler Entites Seeking Diligence	.40	340.00
07/06/20 JSF	Telephone Call(s) Participate in Call with Due Diligence Subcommittee for Houlihan and FTI Update	.30	255.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 4

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/14/20 MLC	Analysis of Memorandum Review of debtors' proposed redline of changes to protective order	.80	1,052.00
07/16/20 MLC	Analysis of Memorandum Review of Debtors' motion to approve second amended protective order	.80	1,052.00
07/22/20 JSF	Telephone Call(s) Participate in Conference Call - Joint Presentation of Financial Outlook for Debtors	1.40	1,190.00
07/22/20 JSF	Examine Documents Review Creditors' Presentation on Distributable Value of Debtors	.40	340.00
07/22/20 MLC	Conference call(s) Joint financial presentation by FTI/Houlihan with DOJ	1.50	1,972.50
08/01/20 MLC	Analysis of Memorandum Review of stipulation and order re discovery and sharing of information among AHC, UCC and NCSG	.50	657.50
08/04/20 MLC	Analysis of Memorandum Review of draft memo from KL describing update from FTI/HL on a potential sale and estate value	1.00	1,315.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 5

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/10/20 MLC	Correspondence Scheduling of Raymond-Side Cash & Non-Cash Transaction Summary	.30	394.50
08/11/20 MLC	Analysis of Memorandum review of subpoenas served by the NCSG on certain financial institutions	.60	789.00
08/12/20 JSF	Examine Documents Examine Documents: Review of FTI and Houlihan Update on Debtors' Business Plan and Projections	.40	340.00
08/12/20 MLC	Analysis of Memorandum Review of diligence requests by Ad Hoc Group of Individual Victims	.60	789.00
08/13/20 JSF	Telephone Call(s) Participate in Conference Call with Sackler Advisors to Review Sources and Uses Presentation in Connection with AHC Due Diligence	.80	680.00
08/13/20 MLC	Analysis of Memorandum Review of Raymond Side Cash and Non-Cash Activity Summary	1.10	1,446.50
08/14/20 MLC	Analysis of Memorandum Review and analysis of FTI memo analyzing Sackler Side B finances	1.30	1,709.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 6

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/17/20 MLC	Conference call(s) Conference call with Monitor re status report	.90	1,183.50
08/17/20 MLC	Draft/revise Review of revised draft of information sharing protocol	.60	789.00
08/18/20 JSF	Examine Documents Examine Documents: Review of Draft Information Sharing Protocol with Debtors	.40	340.00
08/19/20 JSF	Examine Documents Review Documents: Review Updated Financial Advisor Presentatin on Net Distributable Value to Creditors	.30	255.00
08/19/20 JSF	Examine Documents Examine Docments: Review FTI and Houlihan Presentation on Distributable Value and Analysis	.50	425.00
08/24/20 MLC	Analysis of Memorandum Review and analysis of memorandum summarizing AHC discovery updates	1.20	1,578.00
08/25/20 MLC	Correspondence Correspondence re scheduled discovery and depositions	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 7

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/25/20 MLC	Analysis of Memorandum Review of certain case law re joint and several liability of Purdue with other drug companies	1.10	1,446.50
08/25/20 MLC	Correspondence Correspondence with NSCG and AHC concerning coordination of discovery	.40	526.00
08/26/20 MAP	Review Documents Read Bloomberg Article on Sackler Transfer of Assets	.30	127.50
08/31/20 MLC	Analysis of Memorandum Review and analysis of summary of David Sackler deposition	1.10	1,446.50
TOTAL PHASE PU01		31.10	\$36,428.50

Phase: PU03

BUSINESS OPERATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/09/20 JSF	Telephone Call(s) Conference Call with Dr. Brenkus re: HRT	.50	425.00
06/09/20 MLC	Conference call(s) Conference call with UCC, AHC, NSCG with Dr Brenkus	1.20	1,578.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 8

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/12/20 MLC	Conference call(s) Conference call/webex session with FTI/Houlihan with AHC and NCSG re business operations of debtors	.50	657.50
06/17/20 MLC	Analysis of Memorandum Review of UCC statement re amended motion to enter into funding agreement with HRT	.70	920.50
06/18/20 MLC	Analysis of Memorandum Review and analysis of UCC statement re HRT motion by Debtors	1.10	1,446.50
06/21/20 MLC	Analysis of Memorandum Review of AHC draft pleading on HRT	.30	394.50
06/23/20 MLC	Court Appearance - General Hearing on HRT motion, as amended, by Debtors	1.10	1,446.50
07/02/20 MLC	Analysis of Memorandum Review of Debtors motion re intellipharmaeueuticals	.80	1,052.00
09/11/20 JSF	Examine Documents Review of Analysis of Motion for KEIP Program and Non-Insider and Insider Bonuses	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 9

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/20 MLC	Analysis of Memorandum Review and analysis of the KEIP/KERP motion and the Rhodes sale motion and supporting declaration	1.40	1,841.00
09/22/20 JSF	Examine Documents Review of Objections to KEIIP Motion and Update on AHC Position re: KEIP	.40	340.00
09/24/20 JSF	Examine Documents Review of E-Mail Memo Providing Update on KEIP and KERP Negotiations and Counterproposal	.20	170.00
09/24/20 JSF	Examine Documents Review of Draft UCC Objection to KEIP/KERP Motion	.30	255.00
09/24/20 JSF	Examine Documents Review of Update on KEIP Motion Discussions and Potential Resolution	.30	255.00
TOTAL PHASE PU03		9.20	\$11,121.50

Phase: PU04

CASE ADMINISTRATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
--------------------------------	--------------------	--------------	---------------

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 10

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/20 MLC	Conference call(s) Conference call with co-counsel	1.20	1,578.00
06/02/20 MLC	Conference call(s) Conference call with counsel and UCC re Dr Brenkus and HRT motion	1.10	1,446.50
06/02/20 MLC	Telephone Call(s) Telcon with David Molton re status of mediation and next steps re plan	.40	526.00
06/02/20 MLC	Analysis of Memorandum Review of supplemental pleadings filed in connection with bar date motion	1.30	1,709.50
06/02/20 JKH	Prepare Legal Papers Preparation for hearing on bar date motion. Assemble Agenda and Pleadings	.20	61.00
06/03/20 MLC	Analysis of Memorandum Review of proposed discovery stipulation prepared by UCC and accompanying side letter with AHC	1.30	1,709.50
06/03/20 MLC	Court Appearance - General Court hearing on bar date motion and responses	2.50	3,287.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 11

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/20 MLC	Conference call(s) Follow up conference call with Leftwich, Peacock, Guard, Eckstein, Ringer and Singer re court hearing, bar date and next steps	.90	1,183.50
06/03/20 JKH	Diary & Docket Review bar date order granting extension and calendaring same	.20	61.00
06/04/20 MLC	Conference call(s) Conference call with DPW and KL re AHC and bar date extension of date	.50	657.50
06/04/20 MLC	Correspondence Correspondence concerning protective order agreement with Sacklers and Purdue	.40	526.00
06/04/20 MLC	Correspondence Correspondence with supporting states concerning report from Court hearing and extension of bar date	.80	1,052.00
06/04/20 MLC	Draft/revise Reviewed revisions to draft side letter to Akin/UCC discovery sharing agreement	1.10	1,446.50
06/04/20 MLC	Correspondence Correspondence with Akin re draft sharing agreement	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 12

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/20 MLC	Correspondence Review of memo summarizing court hearing and related bar date extension issues	.70	920.50
06/05/20 MLC	Analysis of Memorandum Review of letter from Haug Partners to Court	.60	789.00
06/09/20 MLC	Draft/revise Review of proposed revisions to draft side letter to UCC information sharing agreement	.40	526.00
06/13/20 MLC	Correspondence Correspondence re scheduling of meeting re class action opposition	.20	263.00
06/15/20 MLC	Analysis of Memorandum Review of comments from fee examiner and responses thereto	.90	1,183.50
06/18/20 JSF	Examine Documents Review Update to AHC and Professionals re: Status of Pending Motions and Action Items	.60	510.00
06/18/20 MLC	Draft/revise Review and revision to draft of letter to fee examiner responding to various questions	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 13

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/20 MLC	Analysis of Memorandum Review of summary memo prepared by KL re recent filings in case	1.30	1,709.50
06/21/20 MLC	Analysis of Memorandum Review of KL comments to side letter to UCC	.30	394.50
06/22/20 JSF	Telephone Call(s) Conference Call with Reps of DOJ, AD Hoc Professionals and NCSG Professionals re: Update on Various Pending Matters	1.70	1,445.00
06/22/20 MLC	Conference call(s) Conference call with various staff from DOJ, counsel for NCSG and MSG and AHC, and committee members re overview of mediation and plan development	1.60	2,104.00
06/23/20 JSF	Telephone Call(s) Telephonic Participation in Court Hearing re: HRT Agreement	1.20	1,020.00
06/24/20 MLC	Conference call(s) Call with Ken Eckstein and Rachael Ringer re plan issues	.50	657.50
06/24/20 MLC	Conference call(s) Conference call with Andrew Troop and Jim Donahue re proof of claim process	.50	657.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 14

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/20 MLC	Conference call(s) Conference call with AHC counsel (Eckstein and Ringer) re upcoming hearing	.50	657.50
07/01/20 MLC	Correspondence Correspondence re payment of Dr Hyde fees	.30	394.50
07/02/20 MLC	Correspondence Correspondence with AHC counsel re preparation for omnibus hearing	.30	394.50
07/02/20 JKH	Diary & Docket Review motion of insurance claimants and calendar hearing and objection dates	.10	30.50
07/03/20 MLC	Correspondence Correspondence between AHC counsel and DOJ re various deadlines and meetings	.40	526.00
07/09/20 MLC	Conference call(s) Conference call with UCC counsel, AHC and NCSG counsel re article re political contributions	.50	657.50
07/10/20 MLC	Conference call(s) Conference call with Paul Singer and Ken Eckstein re UCC and article re: Debtors' political contributions	.50	657.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 15

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/20 MLC	Correspondence Follow up correspondence re political contributions motion made by UCC	.30	394.50
07/10/20 MLC	Analysis of Memorandum Review of UCC motion re political contributions	.60	789.00
07/11/20 MLC	Correspondence Correspondence among AHC counsel re NCSG communications re UCC political contributions motion	.20	263.00
07/12/20 MLC	Correspondence Correspondence by UCC counsel re pending class action motions	.50	657.50
07/12/20 MLC	Correspondence Correspondence by affected parties responding to UCC proposed stipulation Re: Class Action Motions	.30	394.50
07/12/20 MLC	Correspondence Correspondence by rate payers counsel re UCC proposed stipulation re class action motions	.30	394.50
07/12/20 MLC	Correspondence Correspondence among AHC counsel re UCC proposed stipulation Re: Class Certification Motions	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 16

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/20 MLC	Conference call(s) Conference call with AHC counsel only to review strategies and pending court motions	1.20	1,578.00
07/13/20 MLC	Draft/revise Review of draft of second interim fee application	1.20	1,578.00
07/13/20 MLC	Analysis of Memorandum Review of debtors' motion re extension of non-dischargeability bar date and proposed order re same	.60	789.00
07/13/20 MLC	Correspondence Correspondence with AHC members re PI data review process	.30	394.50
07/13/20 MLC	Telephone Call(s) Telcon with Robert Charbonneau re Florida opposition to various motions	.40	526.00
07/15/20 MLC	Conference call(s) Conference call with Texas concerning proof of claim process and documentation	.40	526.00
07/15/20 MLC	Analysis of Memorandum Review of Debtors' revised opposition to class action motions	.50	657.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 17

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/20 MLC	Conference call(s) Conference call with monitor	.90	1,183.50
07/17/20 MLC	Conference call(s) Conference call with Monitor Vilsack re various matters including political donations by Purdue	.80	1,052.00
07/17/20 MLC	Analysis of Memorandum Review of summary of call with Monitor Vilsack re various matters including political donation process implemented by Purdue	.40	526.00
07/17/20 MLC	Analysis of Memorandum Review of draft joint statement with respect to the exclusivity motion	.60	789.00
07/18/20 MLC	Draft/revise Reviewed and revised statement re debtors' motion to extend exclusivity	.60	789.00
07/18/20 MLC	Analysis of Memorandum Review of NCSG comments to draft of statement concerning debtors' exclusivity motion	.40	526.00
07/19/20 MLC	Correspondence Correspondence re withdrawal of tribal class action motion	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 18

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/20/20 MLC	Draft/revise Review of revisions to joinder to debtors motion to extend exclusivity	.50	657.50
07/20/20 MLC	Draft/revise Review of proposed changes to AHC/NCSG memo in support of exclusivity extension	.90	1,183.50
07/21/20 JSF	Examine Documents Review of Debtors' Motion to Extend Exclusivity and Responses	.20	170.00
07/21/20 MLC	Correspondence Correspondence with counsel for Debtors, AHC and others re preparation for oral argument at July 23 hearing	.20	263.00
07/22/20 MLC	Conference call(s) Conference call with counsel re response to class action certification motions	.70	920.50
07/22/20 MLC	Correspondence Correspondence with UCC counsel re suggestion to adjourn pending motions for class action certification for filing proofs of claims	.30	394.50
07/23/20 JSF	Telephone Call(s) Telephonic Court Hearing to Consider Motion for Exclusivity and Motions to Adjourn Hearing on Class Certification Requests	3.20	2,720.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 19

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/20 MLC	Court Appearance - General Court hearing on various matters including class certification motions by private insurance claimants (MLC Portion)	1.70	2,235.50
07/23/20 MLC	Conference call(s) Follow up conference call with debtors counsel and AHC counsel in preparation for court hearing on class action certification motions	.50	657.50
07/23/20 MLC	Prepare for Court Appearance Prepared for court hearing on pending motions including political contributions issue	1.20	1,578.00
07/23/20 MLC	Correspondence Correspondence re NAACP intent to intervene in Purdue Pharma case	.40	526.00
07/23/20 MLC	Analysis of Memorandum Review of memo summarizing motions pending before the Court in preparation for hearing	.70	920.50
07/24/20 MLC	Analysis of Memorandum Review of proposed order submitted by UCC re adjournment of class action motions	.20	263.00
07/24/20 MLC	Analysis of Memorandum Review and analysis of presentation to DOJ on overview of PHI	.70	920.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 20

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/26/20 MLC	Analysis of Memorandum Review of certain documents provided by Milbank including Rhodes Board meeting minutes	1.10	1,446.50
07/27/20 MLC	Correspondence Review of draft correspondence re response to NAACP request to intervene	.60	789.00
07/27/20 MLC	Correspondence Correspondence among AHC counsel re NAACP request to intervene	.40	526.00
07/28/20 MLC	Correspondence Correspondence with TN and TX re AHC position re NAACP being allowed to "intervene" in bankruptcy case	.20	263.00
07/31/20 MLC	Analysis of Memorandum Review of data concerning county populations throughout the United States	.60	789.00
08/04/20 MLC	Correspondence Correspondence with NCSG re next steps re meeting with NAACP	.40	526.00
08/05/20 MLC	Correspondence Follow up correspondence re NAACP meetings and agenda	.20	263.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 21

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/20 MLC	Correspondence Correspondence from NCSG re request for additional financial information from debtors	.30	394.50
08/06/20 MLC	Conference call(s) Conference call with NCSG and AHC members and counsel in preparation for conference call meeting with NAACP	1.10	1,446.50
08/06/20 MLC	Correspondence Correspondence with states concerning outline of discussion with NAACP	.30	394.50
08/07/20 MLC	Analysis of Memorandum Review and analysis of NAACP motion to intervene in preparation for conference call with NAACP	1.40	1,841.00
08/07/20 MLC	Conference call(s) Conference call with NCSG and representatives of the NAACP regarding NAACP discussion items	1.10	1,446.50
08/11/20 MLC	Analysis of Memorandum review of draft stipulation with debtors and Akin re allowing pursuit of insurance coverage	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 22

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/20 MLC	Analysis of Memorandum Review of revised stipulation with the Debtor and the UCC that would provide the AHC and the UCC joint standing to pursue the insurance coverage through negotiation	.50	657.50
08/13/20 MLC	Conference call(s) Conference call with counsel re preparation for court hearing	.50	657.50
08/14/20 MLC	Correspondence Correspondence from the NAACP concerning role in mediation	.70	920.50
08/17/20 MLC	Correspondence Correspondence with NCSG re filing of response to NAACP request to intervene in mediation	.30	394.50
08/17/20 MLC	Analysis of Memorandum Review of memorandum drafted by Brown Rudnick re Vilsack call with AHC and NCSG	.40	526.00
08/17/20 MLC	Correspondence Follow up correspondence re NAACP request to intervene and NCSG response	.40	526.00
08/18/20 MLC	Analysis of Memorandum Review of NCSG memorandum filed in support of NAACP motion to intervene	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 23

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/20 MLC	Correspondence Correspondence re NAACP request to intervene in mediation	.30	394.50
08/21/20 JSF	Examine Documents Review of Update on Stipulation/Agreement with NAACP re: Participation in Case	.20	170.00
08/22/20 MLC	Correspondence Correspondence re suggested change in AHC brief re NAACP request to intervene in mediation	.20	263.00
08/22/20 MLC	Analysis of Memorandum Review of subpoenas issued by NCSG to various banks seeking documents re Sackler finances	.80	1,052.00
08/24/20 MLC	Correspondence Correspondence with UCC counsel re NAACP stipulation	.40	526.00
08/25/20 JSF	Examine Documents Prepare for Omnibus Hearing - Review Agenda and Applications on for Hearing	.30	255.00
08/25/20 MLC	Conference call(s) Conference call with Andrew Troop and certain States concerning follow up to mediation issues	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 24

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/26/20 JSF	Telephone Call(s) Participate in Telephonic Court Hearing - Omnibus Hearing	1.60	1,360.00
08/26/20 JSF	Telephone Call(s) Participate in Conference Call with Co-Counsel for AHC to Discuss Tasks and Inquiries from AHC Members	.50	425.00
08/26/20 MLC	Court Appearance - General Appeared at court hearing in connection with fee application and related issues	1.60	2,104.00
08/26/20 MLC	Prepare for Court Appearance Prepared for hearing and court's consideration of Otterbourg pending fee application	.90	1,183.50
08/27/20 MLC	Telephone Call(s) Telcon with Jerry Kulback re Colorado municipality and status of matters	.50	657.50
08/31/20 MLC	Correspondence Correspondence re status of mediation and extension by Judge Drain for additional months	.20	263.00
09/01/20 MAP	Review Documents Review docket and recent docket entries	.30	127.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 25

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/20 MLC	Analysis of Memorandum Review of issues presented by NAACP	.70	920.50
09/03/20 MLC	Conference call(s) Conference call with Troop, Donahue and Brattle re issue raised by Brattle	.50	657.50
09/07/20 MLC	Correspondence Correspondence with Troop re Purdue 2020 compensation	.80	1,052.00
09/07/20 MLC	Correspondence Correspondence re scheduling of various mediation sessions	.40	526.00
09/09/20 JSF	Telephone Call(s) Telephone Call: Call with Representatives of Arizona to Provide Update on Case Status	.50	425.00
09/09/20 MLC	Conference call(s) Conference call with Arizona, KL and Jenni Peacock re status of case and mediations	.50	657.50
09/09/20 MLC	Conference call(s) Follow up conference call with Andrew Troop and Jim Donahue re Brattle	.30	394.50
09/10/20 MLC	Conference call(s) Conference call with public governments to discuss and prepare for meeting with NAACP	1.00	1,315.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 26

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/20 MLC	Conference call(s) Conference call meeting with public delegation and NAACP representatives with mediators	1.00	1,315.00
09/10/20 MLC	Correspondence Correspondence with AHC members re NAACP request to intervene	.30	394.50
09/11/20 MLC	Correspondence Correspondence with AHC and NCSG re response to NAACP request to intervene	.50	657.50
09/11/20 MLC	Analysis of Memorandum Review of Letter from the NAACP to the Public Entities regarding the Abatement Agreement	.70	920.50
09/13/20 MLC	Analysis of Memorandum Review and analysis of certain TPP claims	1.40	1,841.00
09/14/20 MLC	Conference call(s) Conference call meeting with AHC counsel re late filed municipality claims	.50	657.50
09/15/20 MLC	Telephone Call(s) Follow up telcon with Ken Eckstein re mediation next steps	.30	394.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 27

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/20 MLC	Conference call(s) Conference call with Chambers re various pending discovery motions and settlement issues	1.10	1,446.50
09/16/20 MLC	Correspondence Correspondence re NAACP request to intervene	1.10	1,446.50
09/16/20 MLC	Correspondence Correspondence among AHC counsel re NCSG requests and certain open issues	.80	1,052.00
09/17/20 MLC	Correspondence Correspondence re scheduling of future mediation sessions	.50	657.50
09/22/20 MLC	Conference call(s) Deposition of Steven Ives (partial attendance)	1.50	1,972.50
09/22/20 MLC	Analysis of Memorandum Review of debtors' draft of Debtors' objection to the ER Doctors' class claim motion	1.40	1,841.00
09/22/20 MLC	Correspondence Correspondence with Troop re adjournment of NAS and other claimants class action motions	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 28

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/20 MLC	Analysis of Memorandum review of draft objection to the ER physicians' class claim	1.10	1,446.50
09/23/20 MLC	Analysis of Memorandum Review of preliminary summary of the Ilene Sackler Lefcourt deposition	.90	1,183.50
09/23/20 MLC	Analysis of Memorandum Review of Stephen Ives Depo Summary	.90	1,183.50
09/23/20 MLC	Correspondence Correspondence among AHC counsel re compensation motion	.60	789.00
09/23/20 MLC	Correspondence Correspondence with West Virginia counsel re pending KEIP motion	.30	394.50
09/23/20 MLC	Analysis of Memorandum Review of Dr Grossman analysis on how best to use NAS funds (provided by NCSG)	.70	920.50
09/24/20 MLC	Correspondence Correspondence from debtors counsel concerning possible resolution of pending KEIP motion	.80	1,052.00
09/25/20 JSF	Examine Documents Review Summary of Theresa Sackler Deposition	.20	170.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 29

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/20 MLC	Analysis of Memorandum Review of summary of deposition of Theresa Sackler	1.20	1,578.00
09/25/20 MLC	Analysis of Memorandum Review of draft mediation expansion order prepared by debtors	1.10	1,446.50
09/25/20 MAP	Review Documents Read 6th cir decision in connection with negotiating class in MDL and related issues	.50	212.50
09/26/20 MLC	Analysis of Memorandum Correspondence concerning debtors' modification to its 2020 compensation motion	.70	920.50
09/26/20 MLC	Correspondence Correspondence with AHC members concerning NCSG request to defer approval for a narrowed list of non-insider employees of debtors for compensation motion	.60	789.00
09/26/20 MLC	Correspondence Correspondence re debtors' draft mediation order	.50	657.50
09/27/20 MLC	Analysis of Memorandum Reviewed suggested changes to debtors' mediation order and sign off by various parties	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 30

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/28/20 MLC	Correspondence Correspondence re various pending motions and resolutions reached by parties	1.10	1,446.50
09/28/20 MLC	Correspondence Correspondence re update to pending class action motions	.80	1,052.00
09/28/20 MLC	Correspondence Correspondence re proposed changes to mediation order	.60	789.00
09/29/20 MLC	Conference call(s) Conference call with Ringer, Eckstein and Singer re discovery platform usage and costs	.60	789.00
09/29/20 MLC	Analysis of Memorandum Review of debtors' statement/objection in response to the ER Doctor's request to adjourn	.60	789.00
09/29/20 MLC	Analysis of Memorandum Review of UCC proposed changes to draft of debtors' mediation expansion order	1.20	1,578.00
09/29/20 MLC	Correspondence Review of proposed changes to mediation order provided by AHC members	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 31

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/29/20 MLC	Correspondence Correspondence re proposed changes re NAACP and mediation order	.60	789.00
09/29/20 MLC	Correspondence Correspondence with debtors' counsel, UCC counsel, NCSG, MSGE and AHC counsel re proposed changes to mediation order	.70	920.50
09/29/20 MLC	Conference call(s) Conference call with Debtors', AHC, UCC and NCSG counsel re mediation order	.50	657.50
09/30/20 JSF	Telephone Call(s) Participate in Telephonic Omnibus Court Hearing re: KERP, Injunction Extension, Sale Motion	3.80	3,230.00
09/30/20 MLC	Court Appearance - General Attended omnibus hearing by remote conference call	4.00	5,260.00
TOTAL PHASE PU04		111.30	\$138,632.50

Phase: PU05

CLAIMS ANALYSIS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
--------------------------------	--------------------	--------------	---------------

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 32

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20 JSF	Examine Documents Examine Documents: Review of Pleadings from Various Consituencies in Support of or Objecting to Motion to Extend Bar Date	.30	255.00
06/03/20 JSF	Telephone Call(s) Participate in Telephonic Hearing re: Extension of Bar Date	2.40	2,040.00
06/04/20 JSF	Examine Documents Examine Documents: Review of Bar Date Order, Notice and Related Materials	1.00	850.00
06/04/20 MLC	Analysis of Memorandum Review of draft of consolidated POC letter	1.30	1,709.50
06/04/20 MAP	Review Documents Review and make edits to consolidate claims materials	.90	382.50
06/05/20 JSF	Telephone Call(s) Call with A, Troop and Kramer Levin re: Response to IPSD Motion to File Consolidated Claim	.40	340.00
06/05/20 JSF	Examine Documents Review of IPSD Motion to File Consolidated Claim	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 33

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/20 MLC	Conference call(s) Meeting with Pillsbury and KL re status of preparation of States' class claims	1.10	1,446.50
06/05/20 MLC	Analysis of Memorandum Review of public school class certification motion	1.30	1,709.50
06/07/20 MLC	Analysis of Memorandum Analysis of memorandum re IPSDs Class Certification Motion	.80	1,052.00
06/08/20 JSF	Telephone Call(s) Call with States Reps re: Proof of Claim Form and Required Information	1.40	1,190.00
06/08/20 JSF	Examine Documents Review of Proof of Claim Forms, Bar Date Order and Required Information for Governmental Entities to Submit Omnibus Claim to Debtors	2.30	1,955.00
06/08/20 MLC	Conference call(s) Conference call with MAP and JSF re undertaking research re certain States' claims	.50	657.50
06/08/20 MAP	Conference call(s) Call with states reps regarding aggregate proof of claim and supporting documentation	1.40	595.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 34

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/08/20 MAP	Telephone Call(s) Call with JSF and MLC regarding aggregate proof of claim and reservation of rights language	.50	212.50
06/09/20 JSF	Telephone Call(s) Call with States re: Status and Proof of Claim Process	.50	425.00
06/09/20 MLC	Conference call(s) Call with Brattle and States re follow up to development of States POC	.50	657.50
06/09/20 MLC	Draft/revise Drafting and revising of reservation provision in draft proof of claim form	1.30	1,709.50
06/09/20 MLC	Correspondence Correspondence with Troop and Brattle concerning draft of consolidated states proof of claim	.50	657.50
06/09/20 MAP	Research Research Mass Tort Bankruptcy Proofs of Claim for purpose of drafting reservation of rights for Government Entities Consolidated Proof of Claim	3.30	1,402.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 35

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/09/20 MAP	Review Documents Review Bar Date Order for purpose of drafting reservation of rights for Government Entities Consolidated Proof of Claim	1.00	425.00
06/09/20 MAP	Draft/revise Draft Reservation of Rights for Government Entities Consolidated Proof of Claim	3.90	1,657.50
06/10/20 JSF	Examine Documents Review of Outline to Objection to IPSP Motion to Certify Class	.30	255.00
06/10/20 MLC	Analysis of Memorandum Reviewed and analyzed outline of AHC objection to the IPSPs' class certification motion	1.20	1,578.00
06/10/20 MAP	Draft/revise Revise reservation of rights language for Government Entities consolidated proof of claim	1.50	637.50
06/11/20 MLC	Analysis of Memorandum Review of comments from Troop to draft opposition to class certification motion	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 36

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/12/20 JSF	Telephone Call(s) Call with Purdue Professionals re: Letter to go to States, Cities and Municipalities Advising of Bar Date and Ability to Join in Omnibus Claim by AHC	.50	425.00
06/12/20 JSF	Examine Documents Review Draft Materials - Letter and Exhibits - to Governmental Entities re: Filing Omnibus Claim by AHC	.90	765.00
06/12/20 JSF	Examine Documents Bar Date Order re: Filing Omnibus Claim by AHC for Governmental Entities	.30	255.00
06/12/20 MLC	Conference call(s) Conference call with AHC counsel, Troop and MacClay re class claim opposition	.50	657.50
06/12/20 MLC	Analysis of Memorandum Review and analysis of MAP memorandum re class action certification cases	1.40	1,841.00
06/12/20 MLC	Correspondence Correspondence with MSGE, NCSG and AHC counsel re class action certification motion and relationship to MDL	.50	657.50
06/12/20 MLC	Draft/revise Reviewed and revised draft of consolidated states POC - reservation provisions	1.70	2,235.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 37

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/12/20 MAP	Research Per MLC research on class certification within class settlements in regrad to school district class POC.	.80	340.00
06/12/20 MAP	Telephone Call(s) Phone Call with MLC re assignment on class certification for class action settlement in connection with school district class POC.	.10	42.50
06/13/20 MLC	Analysis of Memorandum Review of comments received from NC DOJ re class action certification motion opposition	.50	657.50
06/14/20 JSF	Examine Documents Review of Draft Letter to Governmental Entities re: Bar Date and Filing of Aggregate Claims	.40	340.00
06/14/20 MLC	Draft/revise Review of proposed revisions to draft consolidated state proof of claim	.70	920.50
06/15/20 JSF	Prepare Legal Papers Prepare Draft of Language for Proof of Claim Form from Order re: Authorization to File and Consenting Claimants and Compare to Bar Date Order Language	.80	680.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 38

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/15/20 JSF	Telephone Call(s) Call with AHC Professionals re: Filing POC as AHC Counsel for Government Claimants	.30	255.00
06/15/20 MLC	Conference call(s) Follow up conference call with counsel re claims analysis process	.70	920.50
06/15/20 MLC	Draft/revise Reviewed proposed revisions and made other revisions to consolidated states POC	1.60	2,104.00
06/16/20 MLC	Conference call(s) Conference call with States and Brattle concerning analysis of underlying units of claims	.80	1,052.00
06/16/20 MLC	Telephone Call(s) Telcon with Andrew Troop and Jim Donahue re claims' analysis of consolidated state claim	.80	1,052.00
06/16/20 MLC	Draft/revise Reviewed and revised narrative to consolidated states proof of claim	1.40	1,841.00
06/17/20 JSF	Examine Documents Review AHC Draft Response to Motion of IPSP for Class Certification	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 39

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/20 MLC	Correspondence Correspondence with NCSG re proposed revisions to opposition to class action certification motion	.30	394.50
06/18/20 JSF	Examine Documents Review of NCSG Mark-Up of Objection to IPSD Motion for Class Certification	.20	170.00
06/18/20 JSF	Examine Documents Review of Revised Materials to Governmental Entities Re: Bar Date and Process for Filing Consolidated Claim	.60	510.00
06/18/20 MLC	Analysis of Memorandum Review of the draft memo re class action certification opposition	.80	1,052.00
06/19/20 MLC	Analysis of Memorandum Review and analysis of Kentucky Purdue settlement agreement	.90	1,183.50
06/19/20 MLC	Analysis of Memorandum Review of Nevada proof of claim draft	.40	526.00
06/20/20 MLC	Draft/revise Reviewed and revised draft of consolidated states POC reservation section	2.10	2,761.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 40

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/20 MAP	Correspondence Email MLC reservation of rights language for consolidated POC	.10	42.50
06/23/20 MLC	Conference call(s) Conference call with Andrew Troop and Jim Donahue re analysis of States' consolidated claim	.70	920.50
06/24/20 JSF	Examine Documents Review of Bar Date Order and Transcript for Filing Consolidated Claim for States	.40	340.00
06/24/20 MLC	Prepare for Meeting Prepare for call re proof of claim memorandum	.40	526.00
06/25/20 JSF	Examine Documents Review of Materials for Presentation to States re: Filing Consolidated Claim Per Bar Date Order	.80	680.00
06/25/20 MAP	Draft/revise Revise Consolidated Claims Reservation of Rights and integrate language into Consolidate Claim background section	2.10	892.50
06/26/20 JSF	Examine Documents Review Presentation to States re: Bar Date and Consolidated Proof of Claim, Including Bar Date Order Provisions and Governmental POC	1.60	1,360.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 41

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/26/20 MLC	Conference call(s) Conference call with Singer, Leftwich, Ringer and Eckstein re consolidated state claims analysis	.60	789.00
06/26/20 MLC	Conference call(s) Conference call with States re bar date and consolidated proof of claim	.70	920.50
06/26/20 MLC	Draft/revise Drafted and revised presentation of powerpoint re bar date and consolidated proof of claim	4.10	5,391.50
06/26/20 MAP	Draft/revise Per MLC - Revise powerpoint slides for presentation to states regarding consolidated proof of claim	1.30	552.50
06/30/20 JSF	Telephone Call(s) Call with Counsel for NCSG re: Coordinating States for Filing of Consolidated POC Per Bar Order	.70	595.00
06/30/20 JSF	Telephone Call(s) Call with All States to Discuss Process for Filing Consolidated POC Under Bar Order	.70	595.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 42

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/20 JSF	Examine Documents Review of Addendum for Each State to Proof of Claim Regarding Bases for Claims and Analysis of Revisions to State Specific Form	.80	680.00
06/30/20 JSF	Prepare Legal Papers Revisions to State Form Supplementing Consolidated Claim to Be Filed on Behalf of All States and Territories	1.40	1,190.00
06/30/20 MLC	Conference call(s) Conference call with Andrew Troop and Jim Donahue re bar date and gathering of States' information	.50	657.50
06/30/20 MLC	Conference call(s) Conference call with State re gathering of information for preparation of proof of claim	.70	920.50
06/30/20 MAP	Telephone Call(s) Phone call with MLC and JSF regarding consolidated claim supplement and authorization form	.30	127.50
06/30/20 MAP	Draft/revise Draft supplement to consolidated claim and authorization form	5.70	2,422.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 43

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/20 MAP	Draft/revise Review edits to reservation of rights language from Pillsbury	.10	42.50
07/01/20 JSF	Telephone Call(s) Call with Pillsbury Firm re: Template for States' Information in Consolidated States' POC	.20	170.00
07/01/20 JSF	Examine Documents Review Changes and Updates to Consolidated States' Proof of Claim Form and Schedules for Distribution to States for Review	1.40	1,190.00
07/01/20 JSF	Telephone Call(s) Call with State Reps and NCSG and AHC Attorneys re: Consolidated Claim Issues	.70	595.00
07/01/20 MLC	Conference call(s) Working session with Pillsbury re revisions to draft consolidated proof of claim	.80	1,052.00
07/01/20 MLC	Conference call(s) Call with Brattle and Pillsbury and Brown Rudnick re inter-relationship of States/Non-States Proofs of Claim	.70	920.50
07/01/20 MLC	Correspondence Correspondence re non-opioid claims	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 44

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/20 MLC	Analysis of Memorandum Review of summary of Class Action stipulation of certain Canadian claims and related motions pending before Court	1.10	1,446.50
07/01/20 MLC	Draft/revise Reviewed revisions by Pillsbury of States' Consolidated Claims	1.20	1,578.00
07/01/20 MLC	Correspondence Correspondence with Brattle and Pillsbury concerning West Virginia description of claims	.20	263.00
07/01/20 MLC	Correspondence Correspondence with States concerning revisions to Consolidated States Claims	.20	263.00
07/01/20 MAP	Review Documents Review Bar Date Orders and Government POC Form in preperation of Conference Call with Pillsbury regarding consolidated claim	.60	255.00
07/01/20 MAP	Telephone Call(s) Phone call with Pillsbury regarding consolidated Proof of Claim	.20	85.00
07/01/20 MAP	Review Documents Review Pillsbury's edits to Consolidated Proof of Claim Supplement & Authorization	.40	170.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 45

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20 MLC	Conference call(s) Call with Brattle and Pillsbury re working session on State's consolidated proof of claim	1.00	1,315.00
07/02/20 MLC	Correspondence Correspondence with States concerning Brattle's analysis of each State	.20	263.00
07/02/20 MLC	Analysis of Memorandum Review of class action motions filed by private insurance claimants	1.30	1,709.50
07/02/20 MLC	Correspondence Correspondence re estimation of claims of municipalities	.40	526.00
07/02/20 MLC	Correspondence Correspondence with Debtors' counsel, NCSG and MSGE counsel, and AHC counsel re meeting to discuss class action motions	.20	263.00
07/02/20 MLC	Correspondence Correspondence with Ted Miller re estimation of municipal claims	.20	263.00
07/02/20 MLC	Review Financial Documents Review of Brattle estimation of damages for U.S. states and territories, including federal disbursements and excluding municipalities	1.10	1,446.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 46

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20 MLC	Draft/revise Review of Pillsbury proposed changes to draft of Consolidated States claims	.80	1,052.00
07/02/20 MLC	Review Financial Documents Review of Brattle's proposed changes to working draft	.60	789.00
07/02/20 MLC	Correspondence Correspondence between Troop, Donahue and Brattle concerning calculations of certain damages	.30	394.50
07/03/20 MLC	Conference call(s) Conference call with Purdue counsel re class action certification motions	.70	920.50
07/03/20 MLC	Conference call(s) Conference call with Purdue AHC counsel re proofs of claims	1.00	1,315.00
07/06/20 MLC	Conference call(s) Conference call with Purdue AHC counsel and DPW re response to Class Claims motions	1.10	1,446.50
07/07/20 JSF	Examine Documents Review of Comments from States re: Consolidated Claim Submission	.20	170.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 47

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/07/20 MLC	Conference call(s) Conference call with KY and Paul Singer re proof of claim process	.50	657.50
07/07/20 MLC	Conference call(s) Conference call with Brattle and Pillsbury with States re preparation of consolidated proof of claim	.80	1,052.00
07/08/20 JSF	Examine Documents Review Documents: Revisions to States' Consolidated Claim	.30	255.00
07/08/20 MLC	Conference call(s) Conference call with Alabama outside counsel re proof of claim process	.60	789.00
07/08/20 MAP	Draft/revise Revise reservation of rights language to reflect severability of claims	.80	340.00
07/09/20 MLC	Conference call(s) Conference call with KL and DPW re stipulation entered into between Debtors and certain Canadian classes	.80	1,052.00
07/09/20 MLC	Analysis of Memorandum Review and analysis of motion concerning Canadian class stipulation	1.40	1,841.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 48

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/09/20 MLC	Correspondence Correspondence with Troop re different approaches suggested by different States' Consolidated Claim	.20	263.00
07/10/20 MLC	Conference call(s) Conference call in which Dr Hyde describes nature of hospitals' claims	.80	1,052.00
07/10/20 MLC	Analysis of Memorandum Analysis of nature of hospital claims	.30	394.50
07/10/20 MLC	Conference call(s) Conference call with DOJ, AHC, NCSG and MSG re overview of HHS potential claims and related matters	1.00	1,315.00
07/10/20 MLC	Conference call(s) Conference call with Alabama outside counsel re proof of claim process	.50	657.50
07/10/20 MLC	Conference call(s) Conference call with KY counsel re proof of claim process	.50	657.50
07/10/20 MLC	Analysis of Memorandum Review of analysis prepared by Dr Hyde Re: Hospital Claims	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 49

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/20 MLC	Correspondence Correspondence with Ringer re Ted Miller's analysis	.20	263.00
07/10/20 MLC	Analysis of Memorandum Review of motion filed by Tribe re class action certification	.50	657.50
07/11/20 MLC	Correspondence Review of email from MSGE to Brown Rudnick concerning filing of claims by municipalities	.40	526.00
07/12/20 MLC	Telephone Call(s) Telcon with Troop re drafting of consolidated states claim	.40	526.00
07/12/20 MLC	Correspondence Correspondence with Troop and Donahue re consolidated states claim	.30	394.50
07/13/20 JSF	Telephone Call(s) Call with Pillsbury Firm and State Reps re: Revisions to States' Consolidated POC and Process for Filing	.50	425.00
07/13/20 JSF	Examine Documents Review of Updated Consolidated States' POC Forms	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 50

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/20 MLC	Conference call(s) Working session conference call with Pillsbury to review and revise consolidated proof of claim draft	.50	657.50
07/13/20 MLC	Correspondence Response to MSGE re claims of municipalities	.30	394.50
07/13/20 MLC	Correspondence Correspondence with Emily Grimm re Ted Miller analysis	.30	394.50
07/13/20 MLC	Draft/revise Review of Pillsbury revisions to consolidated state claim	1.10	1,446.50
07/13/20 MLC	Analysis of Memorandum Review of draft of Florida opposition to class action motions	.50	657.50
07/13/20 MLC	Analysis of Memorandum Review of Brattle update of analysis of claims	.40	526.00
07/13/20 MLC	Analysis of Memorandum Review of draft of opposition by AHC/NCSG/MSGE to class action motions	.80	1,052.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 51

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/20 MLC	Correspondence Correspondence with States re proposed changes to draft of consolidated states claim	.70	920.50
07/13/20 MAP	Conference call(s) Conference call with Pillsbury and J Donahue regarding status of State Consolidated Proof of Claim	.50	212.50
07/14/20 MLC	Conference call(s) Conference call with Brattle and the States re preparation of the consolidated proof of claim	1.00	1,315.00
07/14/20 MLC	Conference call(s) Conference call with Troop and Brattle re number of deaths from opioid's and related metrics	.50	657.50
07/14/20 MLC	Correspondence Correspondence with Jim Donahue and Troop re Brattle analysis and follow up changes	.40	526.00
07/14/20 MLC	Prepare for Meeting Prepared for meeting with States and Brattle	.80	1,052.00
07/14/20 MLC	Correspondence Correspondence with Brattle and Pillsbury re opioid death data	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 52

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/20 JSF	Examine Documents Comments from States to Consolidated Claim Materials	.50	425.00
07/15/20 JSF	Telephone Call(s) Call with Pillsbury re: Revisions to Consolidated State Claim	.30	255.00
07/15/20 MLC	Telephone Call(s) Telcon with Paul Singer and Pillsbury re Texas proof of claim Data for Consolidated Claim	.50	657.50
07/15/20 MLC	Telephone Call(s) Call with Virgin Islands re proof of claim process	.50	657.50
07/15/20 MLC	Correspondence Correspondence with States to collect data for Brattle computations	.80	1,052.00
07/15/20 MLC	Draft/revise Reviewed and revised draft of Consolidated States Claim	1.30	1,709.50
07/15/20 MLC	Analysis of Memorandum Review of Pillsbury comments and proposed revisions to draft opposition re class action motions	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 53

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/20 MLC	Analysis of Memorandum Review of Texas draft of Consolidated State Claim	.60	789.00
07/15/20 MLC	Correspondence Review of Bratte's communications with States re State calculations estimates	.60	789.00
07/15/20 MLC	Correspondence Email with Carol Jacobs from Virgin Islands re POC process	.20	263.00
07/15/20 MLC	Correspondence Correspondence with States' working group re next steps	.40	526.00
07/15/20 JKH	Review/analyze Review of state schedules	.60	183.00
07/15/20 MAP	Conference call(s) Conference Call with Otterbourg Team & Pillsbury regarding State Consolidated Proof of Claim	.30	127.50
07/15/20 MAP	Draft/revise Review latest draft of State Consolidated Proof of Claim form and comments from states regarding POC Form	.20	85.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 54

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/20 JSF	Examine Documents Review AHC Objection to Motions to File Consolidated Claim	.40	340.00
07/16/20 JSF	Examine Documents Revised Consolidated Claim Form and Supporting Information Delivered to States	.60	510.00
07/16/20 MLC	Conference call(s) Conference call meeting with Pillsbury re revisions to proof of claim draft	1.10	1,446.50
07/16/20 MLC	Conference call(s) Conference call with Molton, Cicero, Eckstein and Ringer re certain changes proposed to States' collective theories in POC	.50	657.50
07/16/20 MLC	Draft/revise Revised narrative in States' draft POC re focus on municipalities	.70	920.50
07/16/20 MLC	Correspondence Review of Brattle email describing proposed narrative re States' POC	.60	789.00
07/16/20 MLC	Correspondence Correspondence by David Nachman re proposed narrative description in POC	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 55

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/20 MLC	Analysis of Memorandum Review of draft opposition to motion for class certification	.90	1,183.50
07/16/20 MLC	Draft/revise Reviewed and revised drafts prepared by Brattle of each State's summary	1.70	2,235.50
07/16/20 MLC	Correspondence Correspondence involving Alabama POC issues	.40	526.00
07/16/20 MLC	Analysis of Memorandum Review of Florida's opposition to class action motion	.80	1,052.00
07/16/20 MLC	Correspondence Correspondence with AHC counsel re opposition to pending class action motion	.30	394.50
07/16/20 MLC	Analysis of Memorandum Review of UCC statement re class action motions and request for adjournment	.50	657.50
07/16/20 MLC	Correspondence Correspondence with AHC counsel and counsel for MSGE and NCSG re proposed changes to opposition to class action motions	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 56

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/20 JKH	Review/analyze Review revised schedules of States Consolidated Claim	.30	91.50
07/16/20 MAP	Review Documents Review latest draft of Proof of Claim Edits sent to states	.50	212.50
07/17/20 JSF	Examine Documents Review State Supplied Information and Suggested Revisions for Consolidated State POC Information	1.20	1,020.00
07/17/20 MLC	Conference call(s) Conference call with AHC counsel re class action certification motions and potential responses	1.00	1,315.00
07/17/20 MLC	Correspondence Correspondence among AHC counsel re debtors' opposition to class action motions	.30	394.50
07/17/20 MLC	Correspondence Correspondence re authorization requirement for filing of consolidated proof of claim	.80	1,052.00
07/17/20 MLC	Correspondence Correspondence among counsel for AHC and NCSG re UCC request for adjournment of class action motions	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 57

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/20 MLC	Correspondence Correspondence re SC suggested revisions to proof of claim narrative	.30	394.50
07/17/20 MLC	Analysis of Memorandum Review of draft of joinder statement to debtors' opposition to shorten time re class action motions	.50	657.50
07/17/20 MLC	Analysis of Memorandum Review and analysis of memorandum describing obtaining requisite authorization from debtors and UCC	1.10	1,446.50
07/17/20 MLC	Correspondence Correspondence with Maine re proposed changes to consolidated POC narrative	.40	526.00
07/17/20 MLC	Correspondence Correspondence with Michigan re proposed changes to consolidated POC narrative	.70	920.50
07/17/20 MLC	Correspondence Correspondence with Colorado re proposed changes to consolidated POC narrative	.80	1,052.00
07/18/20 MLC	Correspondence Correspondence with TPP counsel re adjournment of class action motions	.20	263.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 58

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/20 MLC	Draft/revise Review of revised draft of opposition to the C&A tribe motion as well as to the Dunford motion	.70	920.50
07/19/20 MLC	Draft/revise Review of revised draft to tribal motion for class certification	.40	526.00
07/20/20 JSF	Examine Documents Consolidated Claim - Review Updated Claim Form and Supplement for Each State	.70	595.00
07/20/20 MLC	Correspondence Correspondence with Pillsbury re proposed changes to draft of consolidated States proof of claim	.60	789.00
07/20/20 MLC	Correspondence Correspondence with KL re revised paradigm for presentation of States consolidated proof of claim	.60	789.00
07/20/20 MLC	Draft/revise Review of proposed revisions to states consolidated POC narrative	.60	789.00
07/20/20 MLC	Draft/revise Review of proposed changes by Arkansas to its POC narrative	.80	1,052.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 59

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/20/20 MLC	Analysis of Memorandum Review of Hospital Claimants' Omnibus Reply to the Objections/Responses	.80	1,052.00
07/20/20 MLC	Correspondence Correspondence with New Mexico concerning participation in consolidated states POC narrative	.40	526.00
07/20/20 MLC	Draft/revise Review of Pillsbury proposed changes to consolidated states POC narrative	.60	789.00
07/21/20 JSF	Examine Documents Review Bar Date Order and Consolidated Proof of Claim Documents	1.60	1,360.00
07/21/20 JSF	Correspondence Draft E-Mail to Debtors re: Authorizations for Consolidated States' Claim	1.20	1,020.00
07/21/20 MLC	Conference call(s) Conference call meeting with States and Brattle re preparation of consolidated proof of claim	.70	920.50
07/21/20 MLC	Conference call(s) Conference call meeting with Brattle and States re proof of claim	1.00	1,315.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 60

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/21/20 MLC	Analysis of Memorandum Review and analysis of Court bar date orders	1.10	1,446.50
07/21/20 MLC	Correspondence Correspondence with Troop, Eckstein and States (Nachman) re proposed revisions to consolidated states narrative	.80	1,052.00
07/21/20 MLC	Draft/revise Review and revision to draft email to UCC and Debtors counsel seeking authorization to file consolidated claim	.80	1,052.00
07/21/20 MLC	Correspondence Correspondence with SD re joining consolidated states POC	.20	263.00
07/21/20 MLC	Correspondence Correspondence with Gerard Cicero re coordinating authorization requests to UCC/Debtors	.30	394.50
07/21/20 MLC	Analysis of Memorandum Review of Reply of The Private Insurance Class Claimants In Further Support of Motion For Leave To File Class Proofs of Claim	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 61

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/21/20 MLC	Analysis of Memorandum Review of court hearing transcripts (January 24 and June 3, 2020) re court colloquy re filing of consolidated proofs of claims	1.30	1,709.50
07/21/20 MLC	Analysis of Memorandum Review of Independent Public School Districts of Omnibus Reply in Support of Motion for Class Certification and a Classwide Proof of Claim	.40	526.00
07/21/20 MLC	Correspondence Correspondence with debtors seeking authorization to file consolidated proof of claim	.20	263.00
07/21/20 MLC	Draft/revise Review of NCSG proposed revisions to draft Dunford objection	.30	394.50
07/21/20 MAP	Draft/revise Draft Memo regarding Bar Date Motion, Bar Date Hearings and Bar Date Orders re: POC Requirements	4.90	2,082.50
07/22/20 JSF	Examine Documents Review of Memo Analyzing Court Transcripts and Bar Date Order re: Filing Consolidated Claim	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 62

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/20 JSF	Examine Documents Review of Replies Submitted in Support of Motions for Class Status for Filing POCS	.40	340.00
07/22/20 JSF	Examine Documents Review of Canadian Litigation Class Stipulation with Debtors	.20	170.00
07/22/20 MLC	Analysis of Memorandum Review of MAP memorandum re structure of filing consolidated proof of claim for states	.80	1,052.00
07/22/20 MLC	Correspondence Follow up correspondence with SD re filing consolidated POC state claims	.40	526.00
07/22/20 MLC	Correspondence Correspondence with GA re consolidated States POC narrative revisions	.40	526.00
07/22/20 MLC	Correspondence Correspondence from Jim Donahue to Brattle suggesting various revisions to Consolidated States POC analysis draft	.60	789.00
07/22/20 MLC	Analysis of Memorandum Review of Brattle's presentation re states consolidated POC analysis and medicaid/medicare reimbursements	.70	920.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 63

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/20 MAP	Draft/revise Revise Draft Memo regarding Bar Date Motion, Hearing Transcripts and Bar Date Orders	2.90	1,232.50
07/23/20 JSF	Telephone Call(s) Call with P. Singer, J. Donahue and Counsel for NCSG and AHC re: States' Consolidated POC	.80	680.00
07/23/20 JSF	Examine Documents Review of Latest Updates to Consolidated Claim Information for States	.90	765.00
07/23/20 MLC	Correspondence Correspondence with Donahue and Pillsbury re States consent to file consolidated states POC	.60	789.00
07/23/20 MLC	Conference call(s) Conference call with Pillsbury and certain State Reps re coordinating response to States consolidated POC	.50	657.50
07/23/20 MLC	Correspondence Follow up correspondence with Brattle re description of States' narrative and description in consolidated POC	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 64

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/20 MLC	Correspondence Follow up correspondence with Debtors' counsel and UCC counsel re authorization to file consolidated claim	.30	394.50
07/23/20 MAP	Telephone Call(s) Phone Call with Pillsbury, Brown Rudnick, and Kramer Regarding States' Consolidated Claim	.80	340.00
07/23/20 MAP	Correspondence Draft of E-Mail to Debtors' and UCC re: States' Consolidated Claim	.30	127.50
07/24/20 JSF	Examine Documents Review of Correspondence with States re: Procedures for Finalizing and Confirming Information in States' Consolidated Claim	.40	340.00
07/24/20 JSF	Examine Documents Review of Memo with Summry of Bar Date Hearing Transcript and Bar Date Orders re: Consolidated Claim Filing	.40	340.00
07/24/20 JSF	Examine Documents Additional Comments from Certain States re: Consolidated Claim Submission	.40	340.00
07/24/20 MLC	Conference call(s) Conference call with Troop and PrimeClerk concerning consolidated proof of claim filed by States	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 65

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/20 MLC	Correspondence Correspondence with Debtors' and UCC counsel re authorization to file consolidated POC	.40	526.00
07/24/20 MLC	Correspondence Correspondence with Pillsbury re drafting revisions to POC narrative	.30	394.50
07/24/20 MLC	Correspondence Correspondence with Prime Clerk re mechanics of filing consolidated POC	.30	394.50
07/24/20 MLC	Correspondence Correspondence with Alabama re consolidated States POC	.30	394.50
07/24/20 MLC	Correspondence Follow up correspondence with States re mechanics of filing consolidated POC and related issues	.60	789.00
07/25/20 MLC	Correspondence Correspondence with MD re their comments to narrative of consolidated proof of claim	.30	394.50
07/25/20 MLC	Correspondence Correspondence with Brattle re New Mexico comments on POC analytics	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 66

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/20 MLC	Correspondence Correspondence with UCC counsel re authorization to file consolidated state POC	.60	789.00
07/26/20 MLC	Correspondence Responsive correspondence to UCC follow up questions re authorization required	.80	1,052.00
07/26/20 MLC	Correspondence Correspondence with Pillsbury and Brown Rudnick re agency relationship and authorizations	.40	526.00
07/26/20 MLC	Draft/revise Drafted and revised response to UCC counsel re authorization and agency relationships	.50	657.50
07/26/20 MLC	Correspondence Response to MD questions re consolidated POC	.20	263.00
07/27/20 JSF	Examine Documents Updates to Documents Supporting Consolidated States' POC	.70	595.00
07/27/20 MLC	Conference call(s) Conference call with Brattle and Pillsbury re proof of claim drafting	1.00	1,315.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 67

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/27/20 MLC	Correspondence Response by non-states to questions raised by UCC counsel re authorizations	.50	657.50
07/27/20 MLC	Draft/revise Further review and revisions to consolidated states POC narrative	1.70	2,235.50
07/27/20 MLC	Correspondence Correspondence with Brattle re calls with individual States re POC	.30	394.50
07/27/20 MLC	Conference call(s) Conference call with Pillsbury and Brattle re changes to consolidated POC	.60	789.00
07/27/20 MLC	Correspondence Correspondence with Utah re narrative POC	.20	263.00
07/27/20 MLC	Correspondence Correspondence re individual state claim numbers	.60	789.00
07/27/20 MLC	Correspondence Review of TN's proposed changes to consolidated states POC narrative	.30	394.50
07/28/20 JSF	Examine Documents Review of Additional Comments from States re: Consolidated Claim and Updated Claim Submission	.80	680.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 68

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/28/20 MLC	Telephone Call(s) Telcon with Gil Gelreich (TN) re Tennessee proof of claim	.50	657.50
07/28/20 MLC	Conference call(s) Conference call with Brattle and States re status of consolidated proof of claim	1.00	1,315.00
07/28/20 MLC	Correspondence Correspondence with Pillsbury concerning RI evidentiary issues	.40	526.00
07/28/20 MLC	Correspondence Correspondence with TN re POC narrative	.30	394.50
07/28/20 MLC	Correspondence Follow up correspondence re RI questions with possible solutions	.20	263.00
07/28/20 MLC	Analysis of Memorandum Review of list of States joining the consolidated POC	.20	263.00
07/28/20 MLC	Correspondence Correspondence with Carol Jacobs of the Virgin Islands re completing information sufficient to join consolidated states' POC	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 69

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/28/20 MLC	Correspondence Correspondence with Guam re need for signature block to join consolidated states' POC	.20	263.00
07/28/20 MLC	Correspondence Correspondence with N Mexico and Brattle re POC numbers and Ted Miller analysis	.40	526.00
07/28/20 MLC	Correspondence Correspondence with Prime Clerk and Brown Rudnick re actual manner of filing consolidated POC	.30	394.50
07/28/20 MLC	Analysis of Memorandum Analysis of memo prepared by Pillsbury concerning status of information provided and consents given state by state	.80	1,052.00
07/28/20 MLC	Correspondence Correspondence with Brattle, Pillsbury and Prime Clerk re mechanics of filing consolidated state POC	.30	394.50
07/28/20 MLC	Draft/revise Reviewed and revised draft narrative re consolidated states POC	.60	789.00
07/28/20 MLC	Analysis of Memorandum Review of death data provided by Brattle as part of consolidated POC	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 70

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/28/20 MLC	Correspondence Correspondence together with Pillsbury with all the states re latest version of consolidated states POC	.30	394.50
07/28/20 MLC	Correspondence Follow up correspondence with states re various revisions to their state numbers	.40	526.00
07/29/20 JSF	Telephone Call(s) Call with Pillsbury Firm re: States' Consolidated Claim Submission	.50	425.00
07/29/20 JSF	Examine Documents Consolidated State Claim Submissions and Supplements	1.30	1,105.00
07/29/20 MLC	Telephone Call(s) Telcon with Andrew Troop re consolidated states POC	.50	657.50
07/29/20 MLC	Conference call(s) Conference call with Singer, Eckstein and KY counsel re KY proof of claim	.50	657.50
07/29/20 MLC	Correspondence Correspondence with GA re consolidated state POC	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 71

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/29/20 MLC	Correspondence Correspondence with WVA re consolidated states POC	.20	263.00
07/29/20 MLC	Conference call(s) Conference call with WVA and Brattle and Pillsbury re revisions to consolidated proof of claim	.30	394.50
07/29/20 MLC	Correspondence Correspondence with Brattle and Pillsbury re Alabama and Kentucky proposed changes to consolidated POC	.40	526.00
07/29/20 MLC	Draft/revise Review of proposed changes to New Mexico part of consolidated POC	.30	394.50
07/29/20 MLC	Correspondence Correspondence with Texas re its state narrative in consolidated POC	.30	394.50
07/29/20 MLC	Draft/revise Review of proposed Pillsbury revisions to consolidated states POC narrative	.60	789.00
07/29/20 MLC	Correspondence Follow up correspondence with WVA and Brattle re WVA narrative portion of consolidated POC	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 72

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/29/20 MLC	Telephone Call(s) Telcon with Robert Charbonneau re FL narrative part of consolidated POC	.30	394.50
07/29/20 MLC	Correspondence Correspondence with Pillsbury and States re press releases and media issues re consolidated POC once filed	.40	526.00
07/29/20 MLC	Draft/revise Review of proposed changes by WVA to consolidated state narrative	.20	263.00
07/29/20 MLC	Draft/revise Further review of changes and revisions to Brattle and Pillsbury portions of consolidated states POC	.80	1,052.00
07/30/20 JSF	Examine Documents Final Consolidated States' Claim for Submission to Claims Agent and Correspondence to Claims Agent	2.40	2,040.00
07/30/20 JSF	Examine Documents Review of Correspondence with States re: States' Claim and Filing by Bar Date Deadline	.40	340.00
07/30/20 MLC	Conference call(s) Conference call with Pillsbury re data compilation for POC	.70	920.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 73

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/30/20 MLC	Conference call(s) Conference call re West Virginia proof of claim	.50	657.50
07/30/20 MLC	Correspondence Correspondence with WVA re final proposed changes to POC narrative	.70	920.50
07/30/20 MLC	Correspondence Follow up correspondence re mechanics of filing consolidated POC with Prime Clerk	.20	263.00
07/30/20 MLC	Analysis of Memorandum Review of Brattle's "final" numbers and tables to be included in consolidated states POC	1.20	1,578.00
07/30/20 MLC	Correspondence Correspondence with Brattle and Pillsbury re Rhode Island proposed revisions to its narrative in consolidated POC	.30	394.50
07/30/20 MLC	Analysis of Memorandum Review of tables prepared by Brattle for Arkansas, Alaska and Arizona in consolidated POC	.60	789.00
07/30/20 MLC	Correspondence Correspondence with Pillsbury re cross checking of state numbers against overall total	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 74

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/30/20 MLC	Draft/revise Drafting of transmittal memorandum to Prime Clerk re filing of consolidated POC	.40	526.00
07/30/20 MLC	Correspondence Correspondence with states re need for "wet" signatures in support of filing of states consolidated POC	.30	394.50
07/30/20 MLC	Correspondence Correspondence with states re change in tables for individual states in connection with consolidated state POC	.50	657.50
07/30/20 MLC	Correspondence Follow up correspondence with South Dakota re change in state's tables	.20	263.00
07/30/20 MLC	Draft/revise Final review of Brattle tables and states' narratives included in consolidated POC	1.30	1,709.50
07/30/20 MLC	Correspondence Correspondence with Pillsbury and Jim Donahue re finalizing consolidated POC for filing	.30	394.50
07/30/20 MLC	Correspondence Correspondence with Prime Clerk and DPW re confirmation of filing of consolidated states POC	.40	526.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 75

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/30/20 MLC	Correspondence Correspondence with Brown Rudnick re filing of non-state consolidated POC	.30	394.50
07/30/20 MLC	Correspondence Correspondence with States re timely filing of consolidated POC	.40	526.00
07/30/20 MLC	Analysis of Memorandum Review of proofs of claim filed by the Federal Government in case	.70	920.50
07/30/20 MAP	Draft/revise Review Final Draft of Governmental Claimant Proof of Claim Form and Attachments for States' POC	.60	255.00
07/30/20 MAP	Draft/revise Review final draft of Schedule 1 and Schedule 10 of States' Consolidated Proof of Claim - Territory Supplement to Consolidated Claim and Authorization Form	.60	255.00
08/03/20 MLC	Correspondence Correspondence with States collecting wet signatures in support of consolidated state POC	.40	526.00
08/03/20 MLC	Correspondence Follow up correspondence with Debtors' counsel re identification of various claims filed	.20	263.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 76

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/20 JSF	Examine Documents Review of Initial Data re: Filed Proofs of Claims	.40	340.00
08/04/20 JSF	Examine Documents Review Breakdown of State Data from Filed Proof of Claim for Distribution to States	.30	255.00
08/04/20 MLC	Conference call(s) Conference call with States and Brattle re follow up to proof of claim analysis	.80	1,052.00
08/04/20 MLC	Correspondence Correspondence with States and Jim Donahue concerning next steps after filing of consolidated POC	.40	526.00
08/04/20 MLC	Correspondence Correspondence with NCSG and Debtors' counsel re breakdown of nature of claims filed in case	.30	394.50
08/04/20 MLC	Correspondence Correspondence with NCSG, Pillsbury and States concerning follow up questions re consolidated POC filed by States and non-States	.60	789.00
08/04/20 MLC	Analysis of Memorandum Review of tables of proofs of claims provided by debtors counsel	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 77

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/20 MLC	Correspondence Follow up correspondence with Troop re questions posed to Debtors re certain claims	.20	263.00
08/07/20 MLC	Correspondence Correspondence re preparation of Brattle presentation in support of consolidated POC	.50	657.50
08/09/20 MLC	Correspondence Correspondence among AHC and NCSG states concerning States Proof of Claim presentation	.50	657.50
08/09/20 MLC	Correspondence Correspondence from Debtors re claims presentation	.30	394.50
08/10/20 JSF	Telephone Call(s) Participate in Conference Call with Debtors and AHC Counsel re: Calculation of States' Claim	.70	595.00
08/10/20 MLC	Conference call(s) Conference call with debtors' counsel and AHC counsel re claim calculations and evaluation	.70	920.50
08/11/20 MLC	Conference call(s) Conference call with States and Brattle re proof of claim follow up questions	.90	1,183.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 78

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/11/20 MLC	Draft/revise Review of and revisions to draft of Brattle presentation to debtors in support of consolidated state POC	1.10	1,446.50
08/11/20 MLC	Correspondence Correspondence re meeting with DOJ	.20	263.00
08/11/20 MLC	Analysis of Memorandum Review of outline of issues raised by the PIs to the State POC	.80	1,052.00
08/12/20 JSF	Examine Documents Review of the Private Claimants' Diligence Requests to AHC re: States' Consolidated Proof of Claim	.20	170.00
08/12/20 MLC	Correspondence Correspondence with Debtors counsel re PrimeClerk disclosure of consolidated state POC	.20	263.00
08/13/20 JSF	Telephone Call(s) Telephone Call: Participate in Telephone Call with AHC Professionals to Discuss Claims Resolution Process and Work Streams Among Counsel	.70	595.00
08/13/20 JSF	Examine Documents Review of Correspondence from Debtor Requesting Information on States' Claim	.20	170.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 79

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/13/20 MLC	Analysis of Memorandum Analysis of memorandum re outline of responses to the PI claimant objections	.90	1,183.50
08/13/20 MLC	Correspondence Correspondence with debtors' counsel re presentation in support of Consolidated States POC	.30	394.50
08/13/20 MLC	Analysis of Memorandum Review of decisions re MDL rulings on derivative issue	1.20	1,578.00
08/14/20 MLC	Conference call(s) Conference call regarding States and muni POCs	1.00	1,315.00
08/15/20 MLC	Draft/revise Reviewed and revised Brattle draft of presentation re consolidated state POC	1.30	1,709.50
08/16/20 MLC	Conference call(s) Conference call with MAP and JSF re research in support of States' claims	.80	1,052.00
08/16/20 MLC	Analysis of Memorandum review and analysis of Outline of Responses re: PI Claimant Objections	.70	920.50
08/16/20 MLC	Analysis of Memorandum Review of MDL rulings on derivative claims	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 80

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/20 MAP	Review Documents Read memo regarding UCC questions re: states' claims	.90	382.50
08/16/20 MAP	Telephone Call(s) Phone call with JSF and MLC regarding research questions as to the States' Claims	.80	340.00
08/17/20 JSF	Prepare Legal Papers Prepare Legal Papers: Draft Information Sharing Protocol with Debtors for Consolidated Claims' Analysis	3.60	3,060.00
08/17/20 JSF	Examine Documents Examine Documents: Review of Memo Analyzing PI Claims and Related Issues	.60	510.00
08/17/20 MLC	Correspondence Correspondence with DPW re description of claims filed by States and Territories	.30	394.50
08/17/20 MLC	Correspondence Correspondence with debtors counsel re presentation by Brattle to Cornerstone	.20	263.00
08/17/20 MLC	Correspondence Correspondence with DPW re consolidated state POC and Prime Clerk analysis	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 81

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/17/20 MLC	Draft/revise Reviewed and revised draft of information sharing protocol with debtors	.90	1,183.50
08/17/20 MLC	Correspondence Correspondence re meeting with debtors, NCSG and Prime Clerk re consolidated POC	.30	394.50
08/17/20 MAP	Draft/revise Review Draft Protocol Sharing Agreement with Debtors regarding States Claim	1.00	425.00
08/17/20 MAP	Review Documents Review Brattle Powerpoint Presentation regarding responses to UCC questions re: States' Claims	.30	127.50
08/17/20 MAP	Research Research legal issues related to UCC objections to consolidated proof of claims	.60	255.00
08/18/20 MLC	Conference call(s) Conference call with States and Brattle re follow-up issues to filing of consolidated POC	.90	1,183.50
08/18/20 MLC	Conference call(s) Conference call with Prime Clerk and States (Andrew Troop) re next steps after filing of States Consolidated POC	.50	657.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 82

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/20 MLC	Correspondence Correspondence with Prime Clerk and Andrew Troop re manner of describing Consolidated States POC on register	.60	789.00
08/18/20 MLC	Correspondence Review of draft email to Troop and Nachman from KL re claims review process	.20	263.00
08/18/20 MAP	Review Documents Review Ohio MDL Decisions on MTD and MSJ in connection with UCC inquiries re: States' claims	.50	212.50
08/18/20 MAP	Review Documents Review research memo on the Personal Injury Claimants' proofs of claim	.90	382.50
08/18/20 MAP	Review Documents Review District Court Order affirming Bankruptcy Court injunction as to nondebtor Related Parties	1.50	637.50
08/18/20 MAP	Review Documents Review UCC questions to State Claims	.10	42.50
08/19/20 JSF	Telephone Call(s) Participate in Video Conference with AHC, NCSG, Brattle Group and Miller Group to Discuss Presentation to Debtors re: States' Claim	2.00	1,700.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 83

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20 JSF	Examine Documents Examine Documents: Review Brattle Group Draft Presentation for Meeting with Debtors to Discuss States' Claim	1.30	1,105.00
08/19/20 MLC	Conference call(s) Conference call with States' counsel with Debtors' counsel providing presentation of data and law in support of consolidated state POC	2.00	2,630.00
08/19/20 MLC	Analysis of Memorandum Review of Motion to Allow Late Filed Proof of Claim to be Treated as Timely Filed Proof of Claim which was filed on behalf of creditor, the City of Bellefontaine Neighbors, Missouri	.60	789.00
08/19/20 MAP	Research Review States' Proofs of Claims and Causes of Action asserted in Proofs of Claim	.50	212.50
08/19/20 MAP	Research Review State Court Dockets in actions brought by states against opioid manufacturers in connection with questions by UCC to states POCs	5.00	2,125.00
08/20/20 MLC	Correspondence Correspondence with DPW re analysis of consolidated state POC	.20	263.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 84

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/20 MLC	Correspondence Correspondence with DPW re Prime Clerk description of consolidated state POC	.20	263.00
08/20/20 MLC	Correspondence Correspondence re scheduling of meeting with DPW re consolidated state POC	.40	526.00
08/20/20 MAP	Research Review State Court Opioid Litigation to review inquiries by PI Claimants to States' Claims	4.30	1,827.50
08/20/20 MAP	Draft/revise Draft Memo Regarding State Court Litigation in response to PI Claimants' questions re: States Claims	2.10	892.50
08/21/20 JSF	Telephone Call(s) Participate in Virtual Meeting with States, Counsel and Advisors to Prepare for Meeting with Debtors to Review States' Claim Calculation	1.20	1,020.00
08/21/20 JSF	Examine Documents Review of Battle Group Presentation to Debtors re: Claim Calculation	.70	595.00
08/21/20 MLC	Conference call(s) Conference call with AHC subcommittee and NCSG subcommittee re States Consolidated POC and presentation to Debtors	1.00	1,315.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 85

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/20 MLC	Correspondence Review of email from DPW responding to UCC letter re mediation strategy and posture	.60	789.00
08/21/20 MAP	Research Research State Opioid Litigation in Response to PI Claimants' questions re: States' POC	3.20	1,360.00
08/21/20 MAP	Draft/revise Revise Memo on State Court Opioid Litigation in Response to PI Claimants' questions re: States' POC	4.20	1,785.00
08/22/20 MAP	Draft/revise Revise Memo on State Court Opioid Litigation in Response to PI Claimants' questions re: States' POC	3.30	1,402.50
08/23/20 MLC	Analysis of Memorandum Review of NYS Opioid discovery orders entered in opoid litigation	1.70	2,235.50
08/23/20 MAP	Draft/revise Revise Memo on State Court Opioid Litigation in Response to PI Claimants' questions re: States' POC	2.60	1,105.00
08/24/20 JSF	Telephone Call(s) Participate in Video Conference of States' Advisors Presentation to Debtors re: States' Consolidated Claim	1.60	1,360.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 86

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/24/20 JSF	Telephone Call(s) Telephone Call: Participate in Follow-Up Call with Counsel for NCSG and AHC re: Response to Debtor's Legal Inquiries on Claim Calculation	.20	170.00
08/24/20 JSF	Examine Documents Review of E-Mails Outlining Legal Issues in Response to Debtor's Inquiries on States' Claim	.30	255.00
08/24/20 MLC	Analysis of Memorandum Review of memo summarizing state laws in support of consolidated state POC	1.10	1,446.50
08/24/20 MLC	Correspondence Correspondence with states re narrative description of claims on Prime Clerk site	.60	789.00
08/24/20 MLC	Prepare for Meeting Prepared for presentation by Brattle and KL of support for consolidated POC claims	1.20	1,578.00
08/24/20 MLC	Conference call(s) Follow up conference call after Brattle presentation to DPW and Cornerstone	.50	657.50
08/24/20 MLC	Correspondence Correspondence with Brattle concerning presentation on consolidated states claims	.40	526.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 87

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/25/20 MLC	Conference call(s) Meeting with States and Brattle concerning Debtors' requests for additional information concerning the Consolidated States POC	1.10	1,446.50
08/25/20 MAP	Correspondence Review email from David Nachman regarding state specific legal analysis	.20	85.00
08/25/20 MAP	Research Legal research regarding email from David Nachman regarding state specific legal issues	2.00	850.00
08/26/20 JSF	Examine Documents Examine Documents - Review Research Provided by States' re: Response to Legal Inquiries from Debtors on States' Claims	1.60	1,360.00
08/26/20 MLC	Analysis of Memorandum Review of research of certain state laws re claims against Purdue	1.50	1,972.50
08/27/20 JSF	Examine Documents Review of Presentation to Debtors of Legal Issues Impacting States' Asserted Claims and Additional Cases to Include	1.80	1,530.00
08/27/20 JSF	Examine Documents Examine Documents: Legal Briefs from States re: Legal Issues Raised by Debtors	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 88

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/27/20 MLC	Analysis of Memorandum Review and analysis of memorandum providing support for claims against Purdue	2.40	3,156.00
08/27/20 MLC	Telephone Call(s) Telcon with Andrew Troop re research memorandum in support of claims	.30	394.50
08/27/20 JKH	Review/analyze Review state responses re: claims	.70	213.50
08/27/20 JKH	Review/analyze Review of filings from MDL litigation re: abatement claims asserted	.60	183.00
08/27/20 MAP	Review Documents Review documents sent by individual states in connection with PI Claimants' Questions re: States' POC	3.60	1,530.00
08/27/20 MAP	Draft/revise Revise powerpoint presentation on States' responses to PI Claimants' Questions re: States' POC	2.20	935.00
08/28/20 MLC	Analysis of Memorandum Review and analysis of summaries of relevant law for NJ, Idaho, Texas, Indiana, Tennessee and Oregon	2.20	2,893.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 89

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/28/20 JKH	Review/analyze Review of state responses to claims questions	1.10	335.50
08/28/20 MAP	Correspondence Organize responses from individual states concerning states' responses to PI Claimants' Questions re: States' POC	.70	297.50
08/28/20 MAP	Review Documents Review responses from states concerning PI Claimants' questions re: States POC	4.40	1,870.00
08/29/20 MLC	Analysis of Memorandum Review and analysis of summaries of state laws of Florida, Michigan and Utah	1.10	1,446.50
08/30/20 JKH	Review/analyze Review of state responses to claims questions	.30	91.50
08/31/20 MLC	Analysis of Memorandum Review and analysis of memorandum summarizing laws of CT	.60	789.00
08/31/20 MLC	Correspondence Correspondence with DPW re description of consolidated claim POC on Prime Clerk web page	.30	394.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 90

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/31/20 JKH	Review/analyze Review state responses re: claims questions	.40	122.00
08/31/20 JKH	Prepare Chart(s) Prepare list of state responses received re: claims questions	.60	183.00
08/31/20 MAP	Review Documents Review State Responses to Questions regarding PI Claimants' Objections to States' POC	2.20	935.00
09/01/20 MLC	Conference call(s) Conference call with States and Brattle re preparation of presentation to Debtors' counsel	.80	1,052.00
09/01/20 MLC	Draft/revise Reviewed and revised draft of Information Sharing Protocol	1.60	2,104.00
09/01/20 MLC	Telephone Call(s) Telcon with Andrew Troop re Information Sharing Protocol	.30	394.50
09/01/20 MLC	Correspondence correspondence with various States' attorneys re their respective State Law claims' analyses	.70	920.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 91

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/20 JKH	Review/analyze Review of state responses re: claims questions	.20	61.00
09/01/20 MAP	Review Documents Review State Responses to PI Claimants' Objections to State POCs	4.70	1,997.50
09/02/20 MLC	Conference call(s) Conference call with DPW and AHC counsel and Troop re analysis of States/Public claims	.90	1,183.50
09/02/20 RCY	Telephone Call(s) Call with MAP re: State proofs of claim.and analysis of same.	1.70	1,062.50
09/02/20 RCY	Examine Documents Review memo re: NY opioid litigation and related documents re: states' consolidated claim	1.50	937.50
09/02/20 JKH	Review/analyze Review of State Responses to Claims Questions	.40	122.00
09/02/20 MAP	Correspondence Review of status of States POC and Informal objections to States' POC	.70	297.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 92

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/20 MAP	Telephone Call(s) Phone Call with RCY regarding status of States' POC and Informal Objections to States' POC	1.70	722.50
09/02/20 MAP	Review Documents Review materials regarding States' POC and informal objections	.30	127.50
09/03/20 MLC	Correspondence Correspondence with Troop re changes to draft of information sharing protocol	.40	526.00
09/03/20 RCY	Examine Documents Revised presentation materials re: public claims.	.30	187.50
09/03/20 JKH	Review/analyze Review of state responses to fee questions	.20	61.00
09/03/20 MAP	Review Documents Review revised powerpoint on States' responses to Debtors' informal objections to States' POC	.20	85.00
09/03/20 MAP	Review Documents Review Debtors' further questions regarding States' POC	.30	127.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 93

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/20 MAP	Review Documents Review edits to Information Sharing Protocol in connection with Debtors' objections to states' poc.	.50	212.50
09/04/20 MLC	Correspondence Correspondence with states re information sharing protocol	.50	657.50
09/04/20 RCY	Examine Documents Florida response to claim inquiry.	.20	125.00
09/04/20 RCY	Examine Documents Continue examine State claim materials for further analysis.	1.70	1,062.50
09/04/20 JKH	Review/analyze Review state responses to claims questions	.30	91.50
09/04/20 MAP	Review Documents Review State Responses to Debtors' Informal objections to states' POC	.80	340.00
09/07/20 MLC	Correspondence Correspondence with Troop re coordination of responses to debtors' due diligence questions re consolidated state POC	.70	920.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 94

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/08/20 JSF	Examine Documents Review of Current Draft of Information Sharing Protocol with Debtors for Sharing of Claim Information	.60	510.00
09/08/20 JSF	Telephone Call(s) Call with Counsel for AHC and NCSG re: Presentation to Debtors on Legal Issues Surrounding States' Claim	1.00	850.00
09/08/20 JSF	Examine Documents Examine Documents: Review of Filed Claim Breakdown Initial Report from Claims Agent	.20	170.00
09/08/20 MLC	Correspondence Correspondence re follow up call with Arizona and settling states	.30	394.50
09/08/20 MLC	Conference call(s) Conference call with NCSG and KL re preparation for meeting with Debtors re claims estimation	1.00	1,315.00
09/08/20 MLC	Conference call(s) Conference call with subcommittee members of AHC re personal injury claimants	.60	789.00
09/08/20 MLC	Correspondence correspondence with Arizona re status of case and general catch up	.50	657.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 95

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/08/20 MLC	Correspondence Follow up correspondence scheduling call with NCSG re claims analysis	.30	394.50
09/08/20 MLC	Analysis of Memorandum Review of Hawaii state law re claims	.40	526.00
09/08/20 RCY	Examine Documents Continue review of State materials and research memo.	1.40	875.00
09/08/20 MAP	Review Documents Prepare for zoom meeting - review states' responses to questions regarding states' POC	.50	212.50
09/08/20 MAP	Conference call(s) Zoom meeting regarding states' presentation to Debtors regarding states' POC	.90	382.50
09/08/20 MAP	Draft/revise Complete notes from 9/8 call on states' presentation to debtors regarding states' POC	.10	42.50
09/09/20 JSF	Examine Documents Review of Additional Responses from States re: Legal Inquiries from Debtors Relevant to Each States' Claims and Supporting Law	.80	680.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 96

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/09/20 MLC	Conference call(s) Conference call with Brattle, Jim Donahue and Andrew Troop re certain open issues	.60	789.00
09/09/20 MLC	Correspondence Correspondence with Jenni Peacock, Paul Singer and John Guard re presentation preparation for Debtors and DPW	.80	1,052.00
09/09/20 RCY	Examine Documents Claims analysis and draft of presentation materials.	1.70	1,062.50
09/09/20 MAP	Research Rsearch State Court Orders on Public Nuisance Claims	3.10	1,317.50
09/09/20 MAP	Review Documents Review states responses to questions regarding States' POC	.50	212.50
09/10/20 JSF	Telephone Call(s) Participate in Conference Call with All States to Prepare for Presentation to Debtors re: Claim Analysis	.50	425.00
09/10/20 JSF	Examine Documents Examine Documents: Review of Updated Presentation to Debtors with Legal Analysis in Support of Claims	1.70	1,445.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 97

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/20 MLC	Conference call(s) Conference call with NCSG, Jim Donahue and AHC counsel re presentation of legal issues in support of State Consolidated POC	.50	657.50
09/10/20 MLC	Conference call(s) Conference call with working group to prepare for presentation in support of states consolidated POC to debtors counsel	1.00	1,315.00
09/10/20 MLC	Correspondence Correspondence with Singer re presentation to debtors' counsel in support of States consolidated POC	.30	394.50
09/10/20 MLC	Correspondence Correspondence with debtors' counsel re Sacklers' depositions and state case law	.40	526.00
09/10/20 MLC	Analysis of Memorandum Review of changes by DPW to draft information sharing protocol	.60	789.00
09/10/20 JKH	Review/analyze Review state responses to legal issues to present to Debtor re: states' claim	.20	61.00
09/10/20 JKH	Review Documents Review of states' presentation to Debtors and review comments regarding same	.30	91.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 98

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/20 MAP	Draft/revise Revise PowerPoint Presentation to Debtors on States' POC	2.70	1,147.50
09/10/20 MAP	Review Documents Review State Responses to Questions Regarding States' POC	.50	212.50
09/10/20 MAP	Research Research State Court Orders concerning public nuisance claims in connection with States' responses to Debtors' questions	1.40	595.00
09/11/20 JSF	Examine Documents Review of Overview of Response to Legal Issues in Support of States' Claim	1.40	1,190.00
09/12/20 MLC	Analysis of Memorandum Review of Purdue liability slides	.60	789.00
09/13/20 JSF	Examine Documents Examine Documents: Review of Claims Filed by TPPs	1.60	1,360.00
09/13/20 MLC	Correspondence Correspondence with NCSG re coordinating responses to motion to allow late filed municipality claims	.30	394.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 99

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/14/20 MLC	Analysis of Memorandum Review of memorandum re West Virginia state laws	.60	789.00
09/14/20 MLC	Correspondence Review of list of priority legal issues with NSCG	.50	657.50
09/14/20 MAP	Review Documents Review states' responses to questions regarding States' POC	.70	297.50
09/14/20 MAP	Correspondence Correspondence regarding states' responses to questions on states' POC.	.30	127.50
09/15/20 MLC	Correspondence Follow up correspondence re meeting with DPW and States re consolidated state claim	.40	526.00
09/15/20 MAP	Correspondence Email correspondence with Melissa Van Eck regarding exhibits to states' responses to states' POC	.10	42.50
09/17/20 MLC	Conference call(s) Conference call with public governments on issue of private abatement	.70	920.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 100

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/17/20 MLC	Analysis of Memorandum Review of certain data re POC Break Down By Claim Type	.40	526.00
09/18/20 MLC	Conference call(s) Conference call meeting re TPP/Public entities	1.00	1,315.00
09/18/20 MAP	Correspondence Email correspondence with MLC re state POC	.10	42.50
09/21/20 MLC	Draft/revise Reviewed, studied and revised KL prepared slide deck for presentation to DPW in support of Consolidated State POC	1.80	2,367.00
09/21/20 MLC	Draft/revise Review of appendix to mediation report and revisions thereto	.60	789.00
09/22/20 MLC	Analysis of Memorandum Review of proposed changes to information sharing protocol by DPW	1.10	1,446.50
09/22/20 MLC	Analysis of Memorandum Review of slide presentation re Purdue liability to States	1.40	1,841.00
09/22/20 MLC	Analysis of Memorandum Review of draft of appendix to mediation report prepared by Gilbert	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 101

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/20 JSF	Telephone Call(s) Participate in Conference Meeting with States and Professionals to Prepare for Meeting with Debtors to Review States ' Consolidated Claim	1.10	935.00
09/23/20 MLC	Conference call(s) Conference call preparing for presentation to Debtors' counsel re States ' consolidated claims	1.30	1,709.50
09/23/20 MLC	Analysis of Memorandum Review of UCC opposition to class action motion by certain hospitals	.60	789.00
09/23/20 MLC	Prepare for Meeting Review of draft slide presentation in preparation for presentation to Debtors	2.20	2,893.00
09/23/20 MLC	Analysis of Memorandum Final review of mediators' report to court	.80	1,052.00
09/23/20 MAP	Correspondence Email MLC regarding question on States ' POC	.20	85.00
09/24/20 JSF	Telephone Call(s) Participate in Conference Call with Members of AHC and NCSG to Prepare for Presentation to Debtors	.90	765.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 102

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/24/20 JSF	Examine Documents Review Revised Presentation to Debtors	1.30	1,105.00
09/24/20 JSF	Telephone Call(s) Participate in Conference with Debtors, AHC and NCSG re: States' Claim	1.60	1,360.00
09/24/20 MLC	Conference call(s) Conference call with KL and certain State representatives to prepare for presentation to debtors re consolidated state POC	1.00	1,315.00
09/24/20 MLC	Conference call(s) Conference call meeting with State and Local Governments with debtors' counsel re consolidated state POC	1.80	2,367.00
09/24/20 MLC	Prepare for Meeting Prepared for presentation to debtors re States' Consolidated POC	.80	1,052.00
09/24/20 MLC	Draft/revise Reviewed and revised draft outline for presentation	.40	526.00
09/24/20 MLC	Analysis of Memorandum Compared Debtors' list of priority legal issues against draft States' presentation of legal liability theories	1.30	1,709.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 103

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/24/20 MLC	Correspondence Follow up correspondence among NCSG and AHC re States' presentation to debtors' representatives addressing legal liability of debtors	.50	657.50
09/24/20 MAP	Conference call(s) Presentation to Debtors on States' POC	1.60	680.00
09/24/20 MAP	Conference call(s) Meeting in preperation of presentation to Debtors on States' POC	.80	340.00
09/24/20 MAP	Review Documents Review presentation slides & legal citations in preperation of presentation to Debtors regarding states' poc	1.50	637.50
09/25/20 MLC	Analysis of Memorandum Review of draft NAS term sheet	.70	920.50
09/29/20 MLC	Correspondence Correspondence re Emergency Doctor putative class	.60	789.00
TOTAL PHASE PU05		402.30	\$388,084.00

Phase: PU06

EMPLOYMENT & FEE APPLICATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
--------------------------------	--------------------	--------------	---------------

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 104

November 13, 2020  
BILL NO. 213603

06/10/20	Examine Documents	.30	255.00
JSF	Revise and Finalize April Fee Statement		
06/26/20	Prepare Legal Papers	1.20	1,020.00
JSF	Prepare and Review Monthly Fee Statement for May		
06/26/20	Prepare Papers	.60	183.00
JKH	Prepare monthly statement		
07/08/20	Prepare Legal Papers	.40	340.00
JSF	Preparation of Second Interim Fee Application		
07/08/20	Prepare Legal Papers	2.90	884.50
JKH	Prepare Second Interim Fee Application		
07/12/20	Prepare Legal Papers	2.80	2,380.00
JSF	Prepare Second Interim Fee Application		
07/13/20	Prepare Legal Papers	1.20	1,020.00
JSF	Revise Interim Fee Application and Exhibits		
07/13/20	Prepare Chart(s)	2.70	823.50
JKH	Prepare exhibits for second interim application		
07/14/20	Prepare Legal Papers	.50	152.50
JKH	Review and finalize second interim fee application		

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 105

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/20 JSF	Examine Documents Review Second Interim Fee Application for Filing	.30	255.00
09/02/20 JKH	Review/analyze Review of order re: fee applications	.20	61.00
09/09/20 JSF	Examine Documents Review of June Time Detail for Preparation of Fee Statement	.80	680.00
09/10/20 JSF	Prepare Legal Papers Review and Revise Ninth Monthly Fee Statement	.70	595.00
09/10/20 JKH	Prepare Legal Papers Prepare draft June statement	.60	183.00
09/11/20 JSF	Examine Documents Review of Ninth Monthly Fee Statement and Expense Back-Up	1.20	1,020.00
09/17/20 JKH	Prepare Legal Papers Prepare monthly statement for July	.80	244.00
09/18/20 JKH	Prepare Legal Papers Prepare final June statement	.60	183.00
TOTAL PHASE PU06		17.80	\$10,279.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 106

November 13, 2020  
BILL NO. 213603

---

Phase: PU08 LITIGATION: CONTESTED MATTERS, ADVERSARY

---

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/11/20 JSF	Examine Documents Review of Appellate Court Decision on Preliminary Injunction and Impact on Case Issues, Including Release Provisions	.80	680.00
08/11/20 MLC	Analysis of Memorandum Review and analysis of decision by Judge McMahon upholding Judge Drain's preliminary injunction barring all claimants from continuing actions against non-debtor officers, directors, affiliates and representatives of Purdue	1.30	1,709.50
08/19/20 JSF	Examine Documents Examine Documents: Review of District Court Injunction Decision and Impact on Case	.40	340.00
08/19/20 MAP	Review Documents Review District Order affirming Bankruptcy Court Injunction	.60	255.00
08/19/20 MAP	Research Research on law in connection with District Court Order affirming bankruptcy court injunction	.90	382.50
TOTAL PHASE PU08		4.00	\$3,367.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 107

November 13, 2020  
BILL NO. 213603

Phase: PU09

MEETINGS & COMMUNICATIONS W/ AD HOC

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20 MLC	Conference call(s) Status update conference call with consenting states	.90	1,183.50
06/01/20 MLC	Conference call(s) Conference call with co-counsel re status update and next steps re pending motions before court and related issues	.50	657.50
06/01/20 MLC	Prepare for Meeting Prepared outline in preparation for call with consenting states re update on pending motions and related issues	1.30	1,709.50
06/03/20 JSF	Telephone Call(s) Telephone Call with AHC. Weekly AHC Meeting	1.80	1,530.00
06/03/20 MLC	Conference call(s) weekly conference call meeting of the AHC (MLC portion)	1.10	1,446.50
06/05/20 JSF	Examine Documents Review of Case Updates to AHC	.50	425.00
06/14/20 JSF	Examine Documents Review of E-Mail Update to AHC re: HRT and IPSD Motion for Class Certification	.20	170.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 108

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/20 JSF	Telephone Call(s) Participate in AHC Weekly Conference Call	1.00	850.00
06/17/20 MLC	Conference call(s) Weekly AHC meeting	1.10	1,446.50
06/18/20 MLC	Telephone Call(s) Telcon with Paul Singer re follow up to aggregate proof of claim process	.50	657.50
06/21/20 MLC	Correspondence Review of counsel memo to AHC committee members re pending motions before the court	.60	789.00
06/22/20 MLC	Telephone Call(s) Telcon with Ken Eckstein and Paul Singer re status of mediation discussions and next steps	.90	1,183.50
06/22/20 MLC	Analysis of Memorandum Analysis of memo from KL to AHC concerning response to HRT	.60	789.00
06/22/20 MLC	Correspondence Correspondence among AHC members re HRT motion and response	.50	657.50
06/24/20 JSF	Telephone Call(s) Weekly Conference Call with AHC to Discuss Case Updates	1.60	1,360.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 109

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/24/20 JSF	Telephone Call(s) Call with P. Singer (TX) and Michael Leftwich (TN) re: Communications with States, Exclusivity Issues, Plan Process, DOJ Discussions	1.20	1,020.00
06/24/20 MLC	Telephone Call(s) Telcon with Paul Singer re plan issues and negotiations with other governmental parties	.80	1,052.00
06/24/20 MLC	Conference call(s) AHC committee meeting	1.80	2,367.00
06/24/20 MLC	Conference call(s) Follow up call with John Guard, Paul Singer, Michael Leftwich, Eckstein and Ringer re plan development issues	.80	1,052.00
06/28/20 JSF	Examine Documents Review of Update to AHC on Action Items (Motions and Approval of Fee Statements)	.20	170.00
06/30/20 MLC	Conference call(s) Meeting with AHC, NCSG and MSGE re bankruptcy plan issues	2.00	2,630.00
07/01/20 JSF	Examine Documents Review of E-Mail to AHC Providing Updates on Filed Motions	.40	340.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 110

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/20 JSF	Telephone Call(s) Participate in AHC Weekly Update Call (JSF portion)	.50	425.00
07/08/20 MLC	Conference call(s) Conference Call: Weekly meeting of AHC committee	1.50	1,972.50
07/09/20 MLC	Correspondence Correspondence with AHC counsel re payments to various political organizations	.80	1,052.00
07/09/20 MLC	Correspondence Correspondence with AHC members re motions pending before Court	.30	394.50
07/10/20 MLC	Correspondence Correspondence with AHC members re pending class action motions	.40	526.00
07/14/20 MLC	Telephone Call(s) Telcon with Robert Charbonneau re Florida's proof of claim	.50	657.50
07/14/20 MLC	Correspondence Correspondence with AHC committee members re opposition to pending class action motions	.70	920.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 111

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/20 JSF	Telephone Call(s) Participate in Weekly Ad Hoc Committee Conference Call	1.50	1,275.00
07/15/20 JSF	Examine Documents Review of Case Updates to AHC re: Pending Motions, Responses and Amended Protective Order	.40	340.00
07/15/20 MLC	Conference call(s) Conference call weekly meeting with AHC	1.40	1,841.00
07/16/20 MLC	Correspondence Review of email to AHC by KL concerning status of various pending matters	.60	789.00
07/16/20 MLC	Correspondence Correspondence by Molton re DOJ request for meeting	.20	263.00
07/17/20 JSF	Correspondence E-Mail: Respond to Inquiries from Rep from State of Michigan re: POC Form and Information	.40	340.00
07/17/20 MLC	Correspondence Correspondence among AHC members re AHC filing joinder to debtors' opposition to motion to shorten re class action motions	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 112

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/20/20 MLC	Correspondence Correspondence with AHC re revisions to draft in support of debtors' motion for exclusivity	.50	657.50
07/22/20 MLC	Correspondence Correspondence with AHC members and counsel re follow up to FTI presentation	.30	394.50
07/22/20 MLC	Correspondence Correspondence with AHC re PEC filing of response re Judge Polster rulings	.30	394.50
07/27/20 JSF	Examine Documents Review of Updates to AHC re: NAACP Motion and Discovery Issues	.40	340.00
07/27/20 MLC	Correspondence Review of KL correspondence with AHC members re NAACP and filing of consolidated claims	.60	789.00
07/29/20 JSF	Telephone Call(s) Weekly Status Conference Call with Ad Hoc Committee	1.60	1,360.00
07/29/20 JSF	Examine Documents Review of Agenda Items for AHC Weekly Meeting	.20	170.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 113

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/29/20 MLC	Conference call(s) Weekly meeting of AHC and its counsel (MLC Portion)	1.10	1,446.50
08/04/20 JSF	Examine Documents Review of Update to AHC Members re: Pending Motions and AHC Responses	.30	255.00
08/05/20 JSF	Telephone Call(s) Participate in Weekly AHC Call with All Members re: Updates to Committee	.70	595.00
08/05/20 JSF	Examine Documents Review of Updates to AHC on Recently Filed Pleadings and Filing of Proofs of Claim by Other Groups	.70	595.00
08/05/20 MLC	Conference call(s) Weekly meeting of AHC	.70	920.50
08/05/20 MLC	Analysis of Memorandum Review and revision to proposed agenda for AHC weekly meeting	.20	263.00
08/11/20 MLC	Telephone Call(s) Telcon with Ken Eckstein re follow up and next steps	.60	789.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 114

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/20 JSF	Telephone Call(s) Participate in Call with Representatives of Certain States to Preview Before AHC Call Certain Issues re: States' Claim and Discussions with Debtors	.50	425.00
08/12/20 JSF	Telephone Call(s) Participate in Weekly Update Telephonic Meeting with AHC	1.50	1,275.00
08/12/20 MLC	Conference call(s) Weekly meeting of AHC committee	1.40	1,841.00
08/12/20 MLC	Analysis of Memorandum Review and revision to agenda for meeting of AHC	.30	394.50
08/13/20 MLC	Draft/revise Review of summary of AHC mediation to date and suggested revisions to email to AHC	.60	789.00
08/17/20 JSF	Examine Documents Examine Documents: Review of Update E-Mails to AHC re: NAACP Motion to Intervene and NAACP Letter	.30	255.00
08/17/20 MLC	Correspondence Correspondence by KL to AHC members re summary of various updates	.60	789.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 115

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20 JSF	Telephone Call(s) Telephone Call: Participate in Weekly Meeting of Ad Hoc Committee to Provide Updates to AHC	1.00	850.00
08/19/20 MLC	Conference call(s) Conference call weekly meeting with AHC members and counsel	1.00	1,315.00
08/19/20 MLC	Draft/revise Reviewed and revised agenda for AHC meeting	.30	394.50
08/25/20 JSF	Examine Documents Review of Updates to AHC re: Discovery Stipulation and NAACP Motion to Intervene	.40	340.00
08/26/20 MLC	Conference call(s) Conference call with AHC counsel	.70	920.50
09/02/20 MLC	Conference call(s) Conference call with counsel in preparation for call with DPW re claims	.30	394.50
09/02/20 MLC	Conference call(s) Conference call with AHC counsel and PEC counsel re claims analysis	.80	1,052.00
09/03/20 MLC	Conference call(s) Weekly meeting of AHC	1.40	1,841.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 116

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/07/20 MLC	Correspondence Correspondence with AHC members concerning mediation sessions	.30	394.50
09/08/20 JSF	Telephone Call(s) Participate in Full AHC Update Call	.80	680.00
09/09/20 JSF	Telephone Call(s) Participate in Telephonic Weekly Update Call with Full AHC	1.10	935.00
09/09/20 JSF	Examine Documents Prepare for AHC Meeting: Review of Agenda and Open Items for Discussion with AHC	.20	170.00
09/09/20 MLC	Conference call(s) Weekly AHC meeting	1.20	1,578.00
09/14/20 MLC	Correspondence Correspondence re meeting with AHC re specific issues	.50	657.50
09/14/20 MLC	Correspondence Correspondence with AHC members re status of various negotiations in the mediations	.80	1,052.00
09/15/20 MLC	Conference call(s) Conference call with Ringer, Eckstein, Singer, Leftwich and Guard re open mediation issues and next steps	.90	1,183.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 117

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/20 JSF	Telephone Call(s) Participate in Telephone Conference for Weekly AHC Meeting	1.10	935.00
09/16/20 JSF	Examine Documents Review of Updates Sent to AHC re: KERP and Sale Motion	.40	340.00
09/16/20 MLC	Conference call(s) Weekly conference call meeting of AHC	1.10	1,446.50
09/16/20 MLC	Analysis of Memorandum Review and changes to draft AHC committee agenda	.40	526.00
09/17/20 MLC	Correspondence Correspondence among counsel and certain AHC members re mediations with certain private groups and plan formulation	.80	1,052.00
09/18/20 JSF	Examine Documents Review of E-Mail to AHC re: Report on Chambers Conference Regarding Mediation	.20	170.00
09/18/20 MLC	Draft/revise Reviewed and revised draft of chambers conference drafted by KL to send to AHC members	.80	1,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 118

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/18/20 MLC	Correspondence Correspondence with AHC members re status of supporting states positions	.60	789.00
09/21/20 MLC	Correspondence Updated summary correspondence to all AHC members re status of various pending matters	.70	920.50
09/22/20 MLC	Conference call(s) Conference call with AHC counsel and Singer, Peacock re discussions with debtors	.90	1,183.50
09/23/20 JSF	Telephone Call(s) Participate in Weekly Update Conference Call of AHC	1.20	1,020.00
09/23/20 MLC	Conference call(s) Weekly meeting of AHC members and counsel	1.10	1,446.50
09/29/20 JSF	Examine Documents Review of Updates to AHC re: KEIP Motion, Voluntary Injunction Extension and Expansion of Mediation	.60	510.00
09/29/20 MLC	Correspondence Correspondence to AHC members providing update re various pending motions	.80	1,052.00
TOTAL PHASE PU09		66.10	\$76,273.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 119

November 13, 2020  
BILL NO. 213603

Phase: PU11

PLAN & DISCLOSURE STATEMENT

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/20 JSF	Examine Documents Review Rearch Re: Settlement Structure to incorporate into plan of reorganization and related issues re: mass tort plans	.30	255.00
06/30/20 JSF	Telephone Call(s) Participate in Conference Call with NCSG, MSG and AHC re: Possible Plan Structure, Plan Issues and Classification	1.70	1,445.00
08/12/20 MLC	Conference call(s) Conference call with Eckstein, Ringer and certain AHC states re next steps in mediation sessions re: Plan Structure and Post-Emergence Entity and Sacklers	.50	657.50
08/13/20 JSF	Examine Documents Examine Documents: Review of Mediation Order re: Parameters of Mediation and Authority of Mediators to Mediate Additional Issues Re: Plan	.40	340.00
08/13/20 MLC	Conference call(s) Conference call re sources and uses presentation by KL	1.00	1,315.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 120

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/14/20 JSF	Examine Documents Examine Documents: Review of Memo to AHC Outlining Issues re: Plan and Treatment of States' Claims	1.30	1,105.00
08/16/20 JSF	Prepare Legal Papers Prepare Legal Documents: Begin to Draft Information Sharing Agreement and Protocols with Debtor for Plan Discussions	1.10	935.00
08/16/20 JSF	Telephone Call(s) Call with MLC and MAP re: Plan and Claim Issues to Research for Discussions with Debtors	.70	595.00
08/16/20 MLC	Correspondence Correspondence among AHC counsel re mediation process and next steps re: Plan	.40	526.00
08/18/20 JSF	Examine Documents Examine Documents: Review of Artticles and Litigation Briefs re: Analysis of Anticipated Plan Issues and Claim Analysis Issues	1.20	1,020.00
08/26/20 JKH	Diary & Docket Review order extending exclusive filing and solicitation periods and calendaring same	.20	61.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 121

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/20 MLC	Analysis of Memorandum Review of order extending mediation Re: Plan and Sacklers	.20	263.00
09/10/20 MLC	Conference call(s) Conference call with AHC counsel re Sacklers' issues and settlement discussions	1.00	1,315.00
09/16/20 MLC	Correspondence Correspondence re upcoming negotiations with certain third parties on next steps to formulate a plan	.70	920.50
09/17/20 JSF	Telephone Call(s) Participate in Conference With Court re: Next Steps for Plan Formulation; Plan and Requests to Continue Mediation	2.00	1,700.00
09/17/20 MLC	Conference call(s) Conference call with Vonnegut, Ringer and AHC counsel re chambers conference on mediation next steps	1.00	1,315.00
09/17/20 MLC	Court Appearance - General Court hearing re certain discovery and other issues on mediation and next steps to get to plan	1.80	2,367.00
09/21/20 MLC	Correspondence Correspondence with counsel re settlement negotiations for plan formulation	.50	657.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 122

November 13, 2020  
BILL NO. 213603

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/20 MLC	Conference call(s) Conference call re abatement programming session for NAS babies	1.00	1,315.00
TOTAL PHASE PU11		17.00	\$18,107.50
		TOTAL FOR SERVICES	\$682,293.50



# **EXHIBIT F**

## **Summary of Expenses**

**DISBURSEMENTS FOR THE APPLICATION PERIOD**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Conference Calls	West Unified (conference call service)	\$1,764.64 <sup>1</sup>
Electronic Research	Westlaw	\$326.49
<b>TOTAL:</b>		<b>\$2,091.13</b>

---

<sup>1</sup> This relates to the following conference calls: (1) conference call held on June 8, 2020, lasting approximately 25 minutes, in which 3 people participated; (2) conference call held on June 8, 2020, lasting approximately 5 minutes, in which 2 people participated; (3) conference call held on June 24, 2020, lasting approximately 35 minutes, in which 3 people participated; (4) conference call held on July 1, 2020, lasting approximately 40 minutes, in which 11 people participated; (5) conference call held on July 14, 2020, lasting approximately 25 minutes, in which 2 people participated; (6) conference call held on July 14, 2020, lasting approximately 15 minutes, in which 5 people participated; (7) conference call held on July 15, 2020, lasting approximately 20 minutes, in which 5 people participated; (8) conference call held on July 16, 2020, lasting approximately 15 minutes, in which 3 people participated; (9) conference call held on July 21, 2020, lasting approximately 55 minutes, in which 8 people participated; (10) conference call held on July 30, 2020, lasting approximately 25 minutes, in which 4 people participated; and (11) CourtSolutions appearance for a hearing held on August 26, 2020; (12) conference call held on August 14, 2020, lasting approximately 35 minutes, in which 8 people participated; and (13) conference call held on August 16, 2020, lasting approximately 55 minutes, in which 3 people participated.

# **EXHIBIT G**

## **List of Expenses**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 123

November 13, 2020  
BILL NO. 213603

DISBURSEMENTS FOR YOUR ACCOUNT

Conference Call(s)	1,764.64
Electronic Research	326.49
	<hr/>
TOTAL DISBURSEMENTS	2,091.13